



R04-22-C-008

City of Chattanooga

Department of Economic Development

Mayor Tim Kelly

November 12, 2021

Environmental Protection Agency
1200 Pennsylvania Ave., N.W.
Washington D.C.

Subject: FY 2022 EPA Cleanup Grant Proposal-City of Chattanooga

Dear sir or madam,

The City of Chattanooga is applying for a \$500,000 EPA Brownfield Cleanup Grant for an abandoned rail corridor in the Alton Park neighborhood of Chattanooga. We thank you for considering our application for brownfield assessment funding and look forward to working with EPA in the future.

GRANT SPECIFICS

1) **Application Identification:**

City of Chattanooga-Department of Economic Development
101 East 11th Street
Chattanooga, TN 37402

2) **Funding Requested:**

- a. Grant Type: Single-Site Cleanup
- b. Federal Funds Requested
 - i. \$500,000
 - ii. City of Chattanooga **not** requesting cost share waiver
 - iii. City of Chattanooga **not** requesting a waiver of the \$500,000 limit

3) **Location:** a) Chattanooga, TN b) Hamilton County c) Tennessee

4) **Property Name and Address:** 3225 Broad Street, Chattanooga, TN 37408-3058

5) **Contacts:**

a) **Project Director:** Sam Saieed
Assistant Director of Community Development
Southeast Tennessee Development District- (*Contract Grant Administrator for City*)
P.O. Box 4757
Chattanooga, TN 37405-4757
Phone: (423) 424-4269
ssaieed@sedev.org

b) **Chief Executive:** The Honorable Mayor Tim Kelly
City of Chattanooga
101 East 11th Street
Chattanooga, TN 37402
Phone: (423) 643-7800
mayor@chattanooga.gov

6) **City of Chattanooga Population:** 181,099 (2020 US Census)

- 7) **Special Considerations Checklist**: Find attached in Appendix.
- 8) **Letter from the State or Tribal Environmental Authority**: Find attached in Appendix.
- 9) **Releasing Copies of Application**: N/A

Best regards,



Tim Kelly
Mayor, City of Chattanooga

Other Factor Checklist

Other Factors	Page #
Community population is 10,000 or less.	NO
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	NO
The proposed brownfield site(s) is impacted by mine-scarred land.	NO
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the project/redevelopment; secured resource is identified in the Narrative and substantiated in the attached documentation.	NO
The proposed site(s) is adjacent to a body of water (i.e., the border of the 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).	YES, Page #2 of Narrative
The proposed site(s) is in a federally designated flood plain.	YES, Page #2 of Narrative
The redevelopment of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy; or any energy efficiency improvement projects.	NO



TENNESSEE DEPARTMENT OF ENVIRONMENT & CONSERVATION
DIVISION OF REMEDIATION
WILLIAM R. SNODGRASS TENNESSEE TOWER
312 ROSA L. PARKS AVENUE, 14TH FLOOR
NASHVILLE, TENNESSEE 37243

November 3, 2021

Dwan Austin
Brownfields Coordinator
City of Chattanooga
101 E. 11th Street
Chattanooga, TN 37402

Re: State Letter of Acknowledgement for the City of Chattanooga Brownfields Cleanup Grant Application

Dear Ms. Austin,

The Tennessee Department of Environment and Conservation (TDEC) is pleased to acknowledge your efforts to apply for a \$500,000 US Environmental Protection Agency (EPA) Brownfields Cleanup Grant for an abandoned rail corridor located at 3225 Broad Street, Chattanooga, TN 37408.

Since many brownfields are abandoned, underutilized, and/or contaminated, TDEC is expressly interested in seeing cities in our state take the initiative to return these sites to productive uses. These efforts are consistent with our mission to enhance the quality of life for citizens of Tennessee and to be stewards of our natural environment. In cooperation with Region 4 EPA, the TDEC brownfields staff will provide technical support and oversight for your grant.

We greatly appreciate your efforts to address brownfields in your city!

Sincerely,

Paula Middlebrooks Digitally signed by Paula
Middlebrooks
Date: 2021.11.03 08:34:45 -05'00'

Paula Middlebrooks
State of Tennessee Brownfields Redevelopment Program
Tennessee Department of Environment and Conservation

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

The City of Chattanooga is requesting \$500,000 in funding for an EPA Brownfields Cleanup Grant for the remediation of the vacant railroad corridor, which will allow for the future development of the **Alton Park Greenway Extension Project**.

a. Targeted Area and Brownfields

i. Background and Description of Target Area- Throughout the 19th and 20th centuries, the Alton Park neighborhood (located in South Chattanooga) thrived due to a strong manufacturing base and benefited from strategic transportation advantages with rail, port, and road access. In the 1920's, the Alton Park neighborhood started to develop an industrial base around the railroad (with textile mills, foundries, manufacturing and railroad maintenance facilities, which provided employment to thousands). During the late 20th century, Alton Park's manufacturing base began to decline. Alton Park suffered some of the city's worst disinvestment, due to the closure of the area's industries (including approximately 10,000 jobs losses). Industrial sites that once brought jobs and economic stability to Alton Park closed their doors and left behind polluted sites, that have blighted the neighborhood. Many of the once-thriving industrial properties became idle and abandoned. Jobs became scarce, commercial businesses had a hard time surviving, houses fell into disrepair, and the level of poverty increased. This brownfield cleanup project will not only remove direct environmental threats to residents but will also help to reverse the systematic environmental and transportation inequities for Alton Park residents.

The Alton Park neighborhood (a 5.81 square mile geographic area) was established as one of the first suburbs of Chattanooga in the late 1800's. The area became an attractive destination for area manufacturers, due to an abundant water supply (Chattanooga Creek, tributary of the Tennessee River), rail access, fuel from nearby natural coal deposits, and proximity to the central business district of downtown Chattanooga. The City of Alton Park was incorporated in 1917 and the city thrived, as it was one of the first outlying areas in Hamilton County to have paved streets, electricity, schools, and sewers. The City of Chattanooga annexed Alton Park in 1930, as the area was experiencing rapid expansion. Alton Park became a manufacturing hub for the city, with the addition of Chattanooga Coke & Chemical Co., Chattanooga Glass Company, Velsicol, and Bunge Foods. The residential growth of Alton Park coincided with the industrial growth of the area. In 1954, the Chattanooga Housing Authority constructed a new public housing development in Alton Park called *Spencer McCallie Homes*. The new concept of public housing caught on and soon *Emma Wheeler Homes*, *Maurice Poss Homes* and *Mary Walker Towers* were also constructed in the area, to keep pace with the demand for affordable housing.

Over the years, Chattanooga and Alton Park's economies developed much like other leading manufacturing cities, being almost-wholly dependent on major industrial plants for most employment opportunities. As the national economy slid into recession during the 1970's, so did the industries and citizens of Chattanooga and Alton Park. **Approximately 10,000 industrial jobs were lost between the 1970's and 2000's in the area, and there were massive layoffs, cut-backs, and company closings.** These layoffs include major job losses at the Combustion Engineering (6,000 jobs losses), Wheeland Foundry (1,130 job losses), Chattanooga Coke and Chemical Company (700 job losses), Ross-Meehan Foundry (500 job losses), Chris-Craft Boat Company (475 job losses), Velsicol (450 job losses), Scholze Tannery (400 job losses), and U.S. Pipe (345 job losses) Many of the residents lost jobs and many of the homeowners (who were aging) lacked the means to maintain their homes. In addition, environmental issues surfaced associated with the previous manufacturing left environmental justice concerns, with the negative environmental conditions disproportionately affecting the majority African American population of Alton Park. These negative environmental and economic impacts severely crippled the once-thriving neighborhood.

ii. Description of the Priority Brownfield Site(s)- The subject property (a 1.2-mile long and approximately 60-80-foot-wide section of abandoned rail line and right of way) currently is vacant and partially overgrown with vegetation. Remnant rail ties containing creosote and other harmful PAHs are present along portions of the property. The Phase I and Phase II identified heavy onsite impacts from creosote, arsenic PAHs, PCBs, and lead in foundry sand and soil. The Phase I also documented the presence of foundry/ fill sand from an unknown source and oily staining on remnant rail ties and associated burned wood. There are no structures onsite, and the cleanup site is contiguous to the Chattanooga Creek, which is a tributary of the nearby Tennessee River. The site is currently vacant, but the fences are in disrepair and are thus very accessible to neighborhood residents, who are unwittingly being exposed to hazardous substances which are present along the corridor. Trespassing and vandalism are common occurrences, as the right of way serves as a pedestrian short-cut to other areas. **There are numerous exposure pathways that are currently affecting the nearby population, including groundwater, soil, dust, and air that are exposing the Alton Park neighborhood to arsenic, creosote and other highly**

dangerous chemicals remnants. The total property area is 9.88 acres, and this property has been acquired by the City of Chattanooga. The Tennessee Trust for Public Land (TPL) acquired the property from the railroad in 2014 and performed the necessary due diligence. Then, the City of Chattanooga acquired the property from TPL in 2017. Before the City acquired the property, the City performed a Phase I and Phase II.

This rail corridor's danger to the surrounding Alton Park neighborhood is emblematic of the systematic Environmental Justice inequities and injustices that have disproportionately affected the African Americans in Alton Park, which is 96% African American and 85% Low-to-Moderate Income (per EPA EJSCREEN Mapper). The old rail bed is full of contaminants that are still a present danger to the surrounding community and are need of cleanup. Based on a review of historical sources, the subject property was improved with rail lines from at least 1917 to at least the 1980's. The western end of the abandoned rail corridor is mostly commercial and mixed-use, but the eastern side of the corridor is almost exclusively residential, with playgrounds, school, churches, and parks bordering the corridor. With the close proximity of the contaminants to sensitive populations (children, elderly, individuals with underlying health conditions), there is an urgent need for the remediation of this brownfield site.

b. Revitalization of the Target Area

i. Reuse Strategy and Alignment with Revitalization Plan-This proposed brownfield cleanup project will allow for the future construction of the Alton Park Greenway. After public input at the Alton Park Neighborhood Association and Chattanooga City Council meetings, citizens and community leaders favored the Alton Park Greenway Extension as the best re-use of the existing contaminated, abandoned rail corridor. The Alton Park residents want the site to be remediated and a connection to the existing Tennessee Riverwalk. Given the site is located in the federally designated floodplain, a greenway is an appropriate reuse for this site, which aligns with the neighborhood's vision. The Alton Park Greenway Extension is an outgrowth from both the previously mentioned neighborhood meetings and the South Chattanooga Trails Plan, which was developed in 2016 by the city, several bike/pedestrian stakeholder groups and various community/ neighborhood groups. This plan called for an East-West Greenway connection, in order to connect the Alton Park neighborhood to the existing Tennessee Riverwalk. The Alton Park Greenway Extension has also been identified as a short-term goal for a brownfield redevelopment project in both the City of Chattanooga Comprehensive Land-Use Plan 2030-Renewing Our Vision and the Area 3 Plan-River to Ridge (sub-area plan for neighborhood).

This proposed Alton Park Greenway Extension will connect the Alton Park neighborhood and the Southside Community Park to the existing Tennessee Riverwalk. The Alton Park Greenway Extension provides a direct connection from the Alton Park neighborhood/ Southside Community Park (former site of Charles A. Bell School, a 2010 EPA Brownfield Cleanup Grantee) to the existing Tennessee Riverwalk (a 7-mile-long multimodal pathway) and downtown Chattanooga, by extending the greenway 1.2 miles along an abandoned rail bed. The Tennessee Riverwalk is composed of an eight-phase, 12-mile Riverwalk that has been transformative for Chattanooga's redevelopment over the past 30 years. The construction of the existing Tennessee Riverwalk was financed by local sources (Chattanooga and Hamilton County, TN), state, federal, charitable foundations, and other sources. Phase 1 of the TN Riverwalk was constructed in 1989 and Chattanooga's riverfront has been transformed from an industrial, perilous, and mostly vacant place into a mecca for tourists and locals to utilize for fun, transportation, and exercise. The existing Tennessee Riverwalk stretches from the Saint Elmo neighborhood on the western end, through downtown, by the Tennessee Aquarium, and moves eastward towards the Chickamauga Dam. Currently, the Riverwalk stretches for 12 miles. **There are still many economic and environmental challenges that make this area the most important Environmental Justice areas of Chattanooga.** In order for the neighborhood to progress even further, Alton Park needs increased transportation corridors and access to the South Broad, St. Elmo and downtown Chattanooga areas. The Alton Park Greenway Extension can help to bridge the divide between the two sections of town, by allowing for a safe transportation corridor between the two areas. This brownfield cleanup proposal would allow for the development of the Alton Park Greenway Extension giving safe pedestrian access for Alton Park neighborhood residents to connect to the completed 12 miles of Tennessee Riverwalk.

ii) Outcomes and Benefits of the Redevelopment Strategy-There are numerous exposure pathways that are currently affecting the nearby population, including groundwater, soil, dust, and air, which are exposing the Alton Park neighborhood to arsenic, creosote, and other highly dangerous chemicals remnants. The subject property currently is vacant and partially overgrown with vegetation. However, the site's fences are in disrepair and are therefore easily

accessible to nearby residents. Remnant rail ties containing creosote and other harmful PAHs are present along portions of the property. This rail corridor's danger to the surrounding Alton Park neighborhood is emblematic of the systematic Environmental Justice inequities and injustices that have disproportionately affected the African Americans in Alton Park, which is 96% African American and 85% Low-to-Moderate Income (per EPA EJSCREEN Mapper).

By remediating and transforming the former rail bed into the Alton Park Greenway Extension, the City of Chattanooga will be creating more greenways and multimodal pathways, giving neighborhood residents the ability to access downtown Chattanooga and 12 additional miles of multimodal pathways. This greenway extension will also connect several transportation networks to the Southside Community Park and to Crabtree Farms (a neighborhood non-profit community farm that grows over 100 varieties of fruits and vegetables), which is one of the few neighborhood sources of fresh produce in Alton Park (which is a food desert, due to the lack of fresh food choices for neighborhood residents) (the nearest grocery store is 3 miles away, which translates to an 45-minute walk each way or a 30-minute bus ride each way). This brownfield cleanup project will lead to better economic development outcomes for Alton Park, including interconnectivity to the existing restaurants and businesses along the Riverwalk. The Greenway Extension will also allow for the movement of people from the existing West Chattanooga Riverwalk area to Alton Park. These visitors will want to frequent the existing businesses in Alton Park and will lead to the demand for additional restaurants, bike shops and residences in the Alton Park area. The proposed trail lighting will utilize solar path lights, in order to be more environmentally friendly. The city will also use economic incentives, to encourage proposed tangential housing and commercial redevelopment, adjacent to the site, that utilizes wind, solar, geothermal, and LEED-certified energy efficiency measures in their construction practices. The completed greenway will allow for increased economic development outcomes for the neighborhood residents, the Alton Park Neighborhood Association, and other stakeholders who have sought to bring more retail establishments to this corridor. **A 2015 University of Connecticut study *The Economic Impact of Greenway and Multi-Use Trails* says that the average per trip expenditure is \$60.26 for pedestrians and \$43.81 for bicyclists. Also, for every single mile of trail built, there is an increased economic impact of \$20,000,000 per year. The City and Alton Park neighborhood hope to garner similar economic impacts with the proposed greenway extension.** The city is in discussions with many commercial entities (including a national grocery store chain and restaurants), and the Alton Park Greenway Extension may help to make the area more attractive to prospective employers and employees. With an increased quality of life from the proposed greenway, the Alton Park neighborhood will be able to become a more livable and walkable community. This project is located in an Opportunity Zone, which will increase the ability for economic development to occur within the project area, by allowing for potential developers to deploy capital and infuse the neighborhood with increased economic investments.

c. Strategy for Leveraging Resources

i. Resources Needed for Site Reuse- The City of Chattanooga was able to acquire the old rail property from the Tennessee Trust for Public Land (TPL) and has paid for the cost of the Phase I ESA (\$5,000), Phase II ESA (\$15,000), and the Analysis of Brownfield Cleanup Activities (\$5,000). With the aid of this US EPA Brownfield Cleanup Grant, the city will implement the cleanup grant activities within the 3-year grant period. The EPA Cleanup Grant (and the City of Chattanooga cost share) will cover the entire cost of the remediation. The City of Chattanooga has received a commitment from the Trust for Public Land to fund the entire construction cost (\$1,200,000) of the Alton Park Greenway. However, the Trust for Public Land has stipulated that it is incumbent on the city to clean-up the rail corridor, which is why the city is applying for the EPA Brownfield Cleanup Grant.

ii) Use of Existing Infrastructure- The abandoned rail corridor land parcels and the parcels adjoining the rail corridor already have existing water, sewer, natural gas, electricity, broadband and all other essential utilities. Therefore, the adjoining parcels would have all of the necessary infrastructure for a trailhead restrooms facility, lighting, and other pedestrian amenities. Also, the existing utilities would allow for the development of associated businesses near the future greenway, such as bike shops, brew pubs, restaurants, convenience stores or other commercial entities.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

a. Community Need

i. The Community's Need for Funding- The Alton Park census tract is in the 95th-100th percentile nationally in the following four categories: Superfund Site Proximity, Minority population, and Low-Income population, and less than high school education. These census tracts have an average of 96% Low Income residents. This area is one of the most important and historic Environmental Justice legacy areas in the Chattanooga. **This rail corridor's danger to the surrounding Alton Park neighborhood is emblematic of the systematic Environmental Justice inequities and injustices that have disproportionately affected the African Americans in Alton Park, which is 96% African American and 85% Low-to-**

Moderate Income (per EPA EJSCREEN Mapper). The community's lack of capital and health challenges is summarized in the below socio-economic demographic statistics.

Demographic	Chattanooga	Alton Park
Population	182,799	4,329
Poverty Rate % of Persons Under	17.6%	42%
% Of Person's Under 18	20%	38%
% Of African American Residents	31%	82%
Median Household Income	\$45,527	\$24,000
Residents with Poor Physical Health	12.5%	21%
Hypertension	19%	46%
Adult Obesity	32%	51%
Residents less than ½ mile from supermarket	28%	85%
Single Parent Household	17%	28%
Children in Poverty	21%	40%
Low Birth Weight	8.2%	19%
Vacant Buildings	2.1%	6%

Source: 2020 US Census Demographic Data

From 2016 until 2019, there have been many job losses from plant closures and downsizing including in a 5-mile radius centered around Alton Park: **Sanofi/ Chattem-160 jobs lost, Invista-175 jobs lost, Norfolk Southern-74 jobs lost, Unum-100 jobs lost**). Also, global factors (30% decrease in sales tax revenue and hotel/ motel taxes, due to the COVID-19 pandemic) have taken a huge financial hit on the city's general fund, making the cleanup impossible to fund with city funds. The City of Chattanooga is not in the position to fund the full cost of the Cleanup of the abandoned rail corridor, due to several factors that have decimated the city's budget in the past five years (including the loss of the Hall Tax and Inheritance Tax). Due to these factors, there has been a 23% decrease in State Aid, from the 2015 until 2020. Also, the State of Tennessee has no state income tax, so there are no additional avenues for increased state revenues. All of these factors have hampered the City of Chattanooga's ability to fund the cleanup of properties such as the abandoned rail corridor in Alton Park.

ii. Threats to Sensitive Populations-1) Health or Welfare of Sensitive Populations- By remediating the abandoned rail corridor of hazardous substances, the City of Chattanooga will eliminate the environmental threats associated with impacts from PAH's, PCB's, lead, and arsenic. The remediation of these hazardous substances will protect the sensitive populations in close proximity to the corridor, such as the **elderly, children, pregnant women, individuals with pre-existing health problems, low-income individuals** and will be at a much lower risk of the subject property contributing to further health problems. Per the EPA Environmental Justice Mapper, **the project area census tract is 42% over age 65 (in the 98th percentile nationwide), has 18% of its population under the age of 5 (in the 99th percentile nationwide).** Per the State of Tennessee Department of Health, **the project area has 73.4 pregnancies per 1,000 females ages 15-44 (which is in the 97th percentile statewide).** The Alton Park census tract is also in the 95th-100th percentile nationally in the following categories: Superfund proximity, Minority population, and Low-Income population, and less than a high school education. These sensitive populations are at an even greater risk of negative health consequences from the nearby hazardous substances. **Per the EPA Environmental Justice Mapper, the project target area census tract-block groups are in the 96th percentile for cancer risk, 94th percentile for air toxics respiratory hazards, 93rd percentile for lead paint indicators, and 99th percentile for Superfund site proximity.** For the subject site in this cleanup application, the Phase I & II identified onsite impacts from PAH's, PCB's, lead, and arsenic in foundry sand and soil. The Phase I & II also documented the presence of foundry/ fill sand from an unknown source and oily staining on remnant rail ties and associated burned wood. **These hazardous substances pose an immediate threat to the nearby neighborhood.** It is relatively easy for children to access the old rail bed and come into contact with these hazardous substances. Cleaning up this brownfield site will reduce the health threats to the sensitive populations that are currently being negatively impacted. This proposed EPA Cleanup Grant project will begin to help to reverse the environmental problems and threats in the Alton Park neighborhood.

2) Greater than Normal Incidence of Disease and Adverse Health Conditions-The Alton Park census tract has a much greater incidence of disease, adverse health conditions, unhealthy behaviors, and negative health outcomes. Per the United States Center for Disease Control, the population of the project area in Alton Park has an Obesity Percentage of 47.4%, which is nearly double of the national average. The **asthma rates for this tract are 14.4% (nearly twice the national average (7%) and state average (8.2%) and the diabetes rate for this tract is 24.7% (which is 3 times higher than the national average (8%) and twice the state average (12.2%)).** By cleaning up the hazardous substances in this brownfield application and by presenting greater opportunities for healthy physical activity (by constructing the Alton Park Greenway Connector), this project will lead to multi-faceted health solutions for the neighborhood. Although the City of Chattanooga is located in a region of

particular scenic beauty, it has poor air quality and serious health concerns, including a high obesity rate, and a ranking of #2 in the country for most challenging places to live with asthma (Asthma and Allergy Foundation of America - 2016 report). Per a 2018 study conducted by the University of TN-Chattanooga, the Alton Park census tract also has a high low-birth-weight infant percentage (19%, compared to the state average of 9.4% and national average of 8.2). The study postulates that one of the factors that cause this cluster of low-birth weight babies (and babies with other birth defects) is environmental exposure to foundry sand, metals, and PAH-impacted soil, which are prevalent not only in the abandoned rail corridor but are also prevalent throughout Alton Park. Per the EPA Environmental Justice Mapper, the project target area census tract-block groups are in the 96th percentile for cancer risk, 94th percentile for air toxics respiratory hazards, 93rd percentile for lead paint indicators, and 99th percentile for Superfund site proximity. The target area's project location is also geographically adjacent to the EPA-funded Southside Chattanooga Lead Superfund Site Cleanup. This proposed EPA Cleanup Grant project will begin to help to reverse the environmental problems of the Alton Park neighborhood, by cleaning up the contaminated soil along the abandoned rail corridor.

3) Promoting Environmental Justice-The three Alton Park census block groups that comprise the area of the project and most of Alton Park are all in the 95th-100th percentile nationally in the following categories: Superfund proximity, Minority population, and Low-Income population, and less than a high school education. Therefore, the legacy environmental justice issues are disproportionately affecting the poorer, minority populations in Alton Park, due to historical policies in which industries were rezoned and sited closer to minority populations, where cheap land could be bought. Per the 2020 US Census, the Alton Park Census Tract has a Median Household Income of \$24,000, which is much lower than the Median Household Income for the State of Tennessee (\$56,000) and the US average (\$66,000). The Poverty Rate is 46%, which is much higher than the Tennessee average (14%) and the US average (12%). The Median Home Values in Alton Park are \$68,000, which is much lower than the Tennessee average (\$190,000) and the US average (\$240,000). Alton Park is a poverty-stricken neighborhood, that also faces the environmental consequences of being the industrial hub of Chattanooga for over a century. Only by beginning to address the environmental impacts can Alton Park begin to address the socioeconomic issues that are plaguing the community. Alton Park residents suffer from a lack of community amenities (parks, public space, commercial options, etc.) and a lack of transportation options, as well as air quality impacts from Interstate 24, the CSX mainline and other operating industries). This project will begin to alleviate these disadvantages by creating a public amenity (greenway connector) that also acts as a transportation option. Due to the mass of Superfund and Brownfield sites that are located in Alton Park, the residents have faced a cumulative negative impact. This cleanup project will enable the residents to see the transformation that the city is intent on making in Alton Park and will help to continue the city's momentum towards addressing the Environmental Justice concerns to Alton Park residents.

2.b. Community Engagement

i. Project Involvement & ii. Project Roles

<u>Partner Name</u>	<u>Point of Contact (name, email, & phone)</u>	<u>Specific Role in the Project</u>
City of Chattanooga (Grantee)	Dwan Austin daustin@chattanooga.gov 423-643-7346	Project Lead and Grantee
Chattanooga Brownfield Task Force/ Southeast Tennessee Development District (<u>Subject Area Expert Partner</u>)	Sam Saieed ssaieed@sedev.org 423-827-7825	The Chattanooga Brownfield task force exists to provide the city with citizen/ stakeholder input on development, monitoring, and updating of the city's Brownfield program which affect Low to Moderate Income residents in East Chattanooga's Brownfield target areas.
Alton Park Neighborhood Association (<u>Community Group Partner</u>)	Vanessa Jackson vanessa3mz87@gmail.com 423-643-7306	The Alton Park Neighborhood Association will provide the meeting location and public venue that the city will communicate project and redevelopment progress to the public.
TN Trust for Public Land (<u>Public Land Conservation and Environmental Advocate Partner</u>)	David Johnson, david.johnson@tpl.org 423-265-5229	The Trust for Public Land will work with the city on project redevelopment planning and construction/ financial management.
Bike/ Walk Chattanooga (<u>Bike/ Pedestrian Community Group and Advocacy Organization</u>)	Kat Volzer, Kvolzer@collegedaletn.gov 423-396-3135	Bike/ Walk Chattanooga will work with the bike/ pedestrian community to market the Alton Park Greenway extension to historically underserved socioeconomic communities by conducting bike rodeos and bike safety education.
Outdoor Chattanooga (<u>Outdoor Activity and Recreation- Community Group and Advocacy Organization</u>)	Phillip Grymes info@outdoorchattanooga.com (423) 643-6888	Outdoor Chattanooga will work with the bike/ pedestrian community to market the Alton Park Greenway extension to historically underserved socioeconomic communities.
Crabtree Farms (<u>nonprofit community-focused sustainable</u>)	Melissa Astin, mastin@crabtreefarms.org	Crabtree Farms will work with historically underserved socioeconomic communities regarding healthy eating and combatting the food desert

farms and agricultural education resource)	423-493-9155	problem in Alton Park. Crabtree Farms is located along the proposed greenway.
Alton Park Development Corporation (Grassroots Economic Development, Housing, & Community Engagement Partner)	George B. Calhoun altonparkcdc.org 423-508-5232	The Alton Park Development Corporation will assist with the Public Outreach and Community Engagement portions of the project.
The Bethlehem Center (Alton Park Community Outreach and Engagement Partner)	Reginald F. Smith III, rsmith@thebeth.org 423-266-1384	The Bethlehem Center will assist with the Public Outreach and Community Engagement portions of the project.
Hamilton County Health Department (County Health Department)	Sabrina Novak snovak@hamiltontn.gov 423-209-8383	The Hamilton County Health Department will conduct onsite health monitoring at all sites being assessed as a part of this grant. This health monitoring is being done at no charge to the city.

1) Chattanooga Brownfield-Community Task Force (Subject Area Expert Partner)-This Task Force is comprised of members of the City ECD staff, city residents who reside near city brownfield sites, staff members of the TN Department of Environment and Conservation, staff members of the Southeast Tennessee Development District (SETDD) (Regional Brownfield Planning entity), environmental engineering consultants, staff of the Hamilton County/ Chattanooga Health Department, brownfield property owners and concerned citizens. The Chattanooga Brownfield task force exists to provide the city with citizen/ stakeholder input on development, monitoring, and updating of the city's Brownfield program which affect Low to Moderate Income residents in East Chattanooga's Brownfield target areas. Chattanooga Brownfield Task Force Meeting occur on a quarterly basis. These meetings are currently being held remotely, due to COVID-19.

2) Alton Park Neighborhood Association (Community Group Partner)-All potential brownfield environmental site assessments and potential brownfield redevelopment projects have been and will continue to be presented at neighborhood meetings, in order to get neighborhood input. City ECD staff are assigned already to attend these meetings and the neighborhood association are small-scale meetings that foster a dialogue between community members. This environment creates a great opportunity for residents to interact with city staff and other brownfield stakeholders. City ECD staff will also present the EPA Cleanup in My Communities website, in order to show the public how to access environmental site assessment results. Project information and successes will also be shared on the City's website.

3) Trust for Public Land, TN Chapter (Public Land Conservation and Environmental Advocate Partner)-The Trust for Public Land will work with the city on project redevelopment planning and greenspace planning related to the city's brownfield redevelopment initiative. Additionally, the TPL is paying for the construction of the Alton Park Greenway Connector, once the cleanup work is completed. <https://www.tpl.org/our-work/alton-park-connector>

4) Bike/ Walk Chattanooga (Bike/ Pedestrian Community Group and Advocacy Organization)-Bike/ Walk Chattanooga will work with the bike/ pedestrian community to market the Alton Park Greenway extension to historically underserved socio-economic communities by conducting bike rodeos and bike safety education.

5) Outdoor Chattanooga (Outdoor Activity and Recreation- Community Group and Advocacy Organization)- Outdoor Chattanooga will work with the bike/ pedestrian community to market the Alton Park Greenway extension to historically underserved socio-economic communities.

6) Crabtree Farms (nonprofit community-focused sustainable farms and agricultural education resource)- Crabtree Farms will work with historically underserved socioeconomic communities regarding healthy eating and combatting the food desert problem in Alton Park. Crabtree Farms is located along the proposed greenway.

7) Alton Park Development Corporation (Grassroots Economic Development, Housing, & Community Engagement Partner)- The Alton Park Development Corporation will assist with the Public Outreach and Community Engagement portions of the project.

8) The Bethlehem Center (East Chattanooga Community Outreach and Engagement Partner)- The Bethlehem Center will assist with the Public Outreach and Community Engagement portions of the project.

9) The Hamilton County Health Department-The Hamilton County Health Department will conduct onsite health monitoring at all sites being assessed as a part of this grant. This health monitoring is being done at no charge to the city.

iii) Incorporating Community Input

The City of Chattanooga's Brownfields Program (housed within the city's Department of Economic and Community Development (ECD)) will look for opportunities to tie into existing community/ stakeholder meetings, which helps to encourage greater stakeholder attendance and participation. City ECD staff will continue to speak in public forums (through all of the project partner meetings), actively seek input on project planning, and are available via phone, email or in person to share and seek information. The city will still hold socially distant, in-person Neighborhood Association Meetings in the project area, as well as remote meetings on Zoom. Many of the area's elderly and low-income residents lack the necessary broadband, internet-compatible

devices, and technological know-how to use Zoom or other platforms, due to the digital divide that affects low-income citizens. Therefore, to be fair to all, the city will have the option of remote and in-person, distanced public hearings. The City of Chattanooga commits to successfully incorporate public and community input in this brownfield project. Additionally, the city will mail written answers to questions at their public hearings and will also place public input comments, questions, and answers on the city's website. Over the course of the grant the city will complete: a community outreach and education plan, meeting materials and project update newsletters, presentations of the EPA Brownfield grant program to the public, potential developers, lending institutions, neighborhood and community groups, and other affected parties. The city will also prepare brochures and other printed materials in order to encourage community involvement and private investment. Also, the city's Department of Economic and Community Development has staff fluent in Spanish, since 6.7% of residents in the project census tracts are Spanish speakers as their first language. These staff members will be on hand for all public meetings, in order to translate the meetings for the Spanish-speaking residents.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a. Proposed Cleanup Plan- The selected Cleanup Plan is as follows: **Excavation and On-site Relocation of Excavated Materials, supplementing the cap within the right of way.** This selected alternative will allow the site to be construction-ready with a contact barrier and clean utility corridor. This remedy was selected because it accomplishes the remediation of the hazardous substances in the most cost-effective manner. This remedy is appropriate because it will reduce human exposure to onsite contamination (including foundry sand, metals, and PAH-impacted soil). The selected alternative will reduce the human exposure to the hazardous substances by eliminating the exposure pathways. The cleanup project associated with this selected alternative will cost \$600,000. This estimate of project cost was derived from the city's Engineering Department, based on current costs with similar remediation projects. This remedy includes the civil design services, implementation of soil management practices, and relocating impacted soil and replacing with clean soil to provide a contact barrier. This remedy meets regulatory criteria. The purpose of cleaning up the former railroad property is for environmental cleanup and to facilitate the construction of the **Alton Park Riverwalk Extension**. The Tennessee Department of Environment and Conservation (TDEC) Division of Remediation (DOR) has been involved with the subject property for many years. In support of Chattanooga's redevelopment efforts and to ensure that site redevelopment is performed in accordance with applicable regulations, the City of Chattanooga has already entered into a Voluntary Brownfield Agreement with TDEC-DOR and has a DOR-approved Interim Soil Management Plan (SMP) and a Health and Safety Plan to ensure that all remediation activities are performed with strict adherence to the health and safety of the public and the environment.

b. Description of Tasks/ Activities and Outputs- The City of Chattanooga has budgeted the 20% cost share (\$100,000) **(cash match (match derived from the City General Fund and is budgeted))**. The tasks that will be accomplished as a part of this grant are as follow:

<u>Task/Activity 1: COMMUNITY ENGAGEMENT</u>
<u>i. Project Implementation:</u> City of Chattanooga staff will participate in the Chattanooga Brownfield Task Force and Alton Park Neighborhood Association Meetings, which will provide an opportunity for the community to ask questions and provide feedback. Outreach will include notifying target area residents (including sensitive populations) that cleanup activities will be conducted within the site. Community engagement will occur throughout the project schedule.
<u>ii. Anticipated Project Schedule:</u> October 2021 until the project completion (September 2024)
<u>iii. Task/Activity Lead(s):</u> City of Chattanooga-Department of Economic and Community Development
<u>iv. Output(s):</u> Attending 12 community meetings; Having at least 4 meeting presentations and making flyers available on the city ECD website and at each meeting.
<u>Task/Activity 2: EPA COOPERATIVE AGREEMENT REPORTING</u>
<u>i. Project Implementation:</u> This task includes all EPA Cooperative Agreement Compliance Reporting, which includes completing 12 Quarterly Reports, 1 MBE-WBE Reporting, 12 ACRES Reporting Periods, Community Engagement Plan, 1 Final Report and 1 Closeout Documentation. This Program Development and Management activity will be overseen by the City of Chattanooga.
<u>ii. Anticipated Project Schedule:</u> October 2021 until Project Completion (September 2024)
<u>iii. Task/Activity Lead(s):</u> City of Chattanooga-Department of Economic and Community Development
<u>iv. Output(s):</u> 12 Quarterly Reports, 1 MBE-WBE Reporting, 12 ACRES Reporting Periods, Community Engagement Plan, 1 Final Report and 1 Closeout Documentation.

<u>Task/Activity 3: Remedial Planning, Design, Observation, Remedial Action Report</u>
<u>i. Project Implementation:</u> This task includes the outputs of finalizing the ABCA, QAPP, finalizing Land Use Restrictions, Soil Management and Health & Safety Plans. This task also includes observation during remedial action and preparing the Remedial Action Report. This Remedial Planning and Design activity will be overseen by the environmental engineer.
<u>ii. Anticipated Project Schedule:</u> Quarter 1: Selection of a Qualified Environmental Contractor (QEC), Quarters 2-3: Project Design, Bid Package and Permitting
<u>iii. Task/Activity Lead(s):</u> Selected Qualified Environmental Contractor (QEC)
<u>iv. Output(s):</u> 1 Successful Remedial Planning and Design and Design within three months of Cooperative Agreement approval.
<u>Task/Activity 4: Cleanup/ Remediation Activities</u>
<u>i. Project Implementation:</u> Consistent with the draft Analysis of Brownfield Cleanup Alternatives, this task includes anticipated contractor costs for removal and onsite relocation of contaminated materials and installation of engineering controls, including caps and barriers. This task also includes a final cleanup/project report and regulatory coordination regarding technical aspects of the project with TDEC and EPA throughout the cleanup effort. The Cleanup Activities will be overseen by the environmental engineer, with the City of Chattanooga assisting.
<u>ii. Anticipated Project Schedule:</u> Quarters 4-6-Cleanup, Abatement and Remediation; Quarters 4-6-Third Party Oversight; Quarters 7-10-Project Closeout.
<u>iii. Task/Activity Lead(s):</u> Selected Qualified Environmental Contractor (QEC)
<u>iv. Output(s):</u> Interim Remediation Report; No Further Action (NFA) letter from TDEC
<u>Task/Activity 5: Brownfield Training Conferences</u>
<u>i. Project Implementation:</u> City of Chattanooga representatives will attend one EPA National Brownfields Conference and two regional Brownfield Conferences to present information regarding the Cleanup Project and to learn from other Brownfield practitioners regarding Brownfield strategies cleanup and reuse best practices.
<u>ii. Anticipated Project Schedule:</u> Conferences tentatively scheduled for (National Conference-September 2022, Regional Conferences-October 2023, and April 2024).
<u>iii. Task/Activity Lead(s):</u> City of Chattanooga-Department of Economic and Community Development
<u>iv. Output(s):</u> Two City of Chattanooga representatives will attend three brownfields-related training conferences

Budget Categories	Project Tasks					
(Programmatic costs only)	<i>Task 1-Community Outreach</i>	<i>Task 2-Cooperative Agreement and Project Management</i>	<i>Task 3 -Remedial Planning, Design, Observation, Remedial Action Report</i>	<i>Task 4-Cleanup Activities</i>	<i>Task 5-Brownfield Training Conferences</i>	<i>Total</i>
Personnel	\$2,500	\$2,500	\$0	\$0	\$0	\$5,000
Fringe Benefits	\$0	\$0	\$0	\$0	\$0	\$0
Travel	\$0	\$0	\$0	\$0	\$15,000	\$15,000
Equipment	\$0	\$0	\$0	\$0	\$0	\$0
Supplies	\$0	\$0	\$0	\$0	\$0	\$0
Contractual	\$2,500	\$10,500	\$94,000	\$373,000	\$0	\$480,000
Total Direct Costs	\$5,000	\$13,000	\$94,000	\$373,000	\$15,000	\$500,000
Total Indirect Costs	\$0	\$0	\$0	\$0	\$0	\$0
Total Federal Funding	\$5,000	\$13,000	\$94,000	\$373,000	\$15,000	\$500,000
City of Chattanooga Cost Share (20%)	\$0	\$0	\$0	\$100,000	\$0	\$100,000
TOTAL BUDGET	Task 1 Total-\$5,000	Task 2 Total-\$13,000	Task 3 Total-\$94,000	Task 4 Total-\$473,000	Task 5 Total-\$15,000	TOTAL PROJECT BUDGET-\$600,000

c. Cost Estimates and Outputs

All of these tasks were developed by the City of Chattanooga Department of Economic and Community Development, in consultation with their brownfield programmatic/ financial consultants and city Engineering staff, who track current costs of materials and construction projects.

Task 1-Community Outreach-\$5,000 total

-Personnel Costs- costs include \$2,500 (50 staff hours×\$50/hour) for city staff time related to community outreach events.

-Contractual-Costs include \$2,500 (50 staff hours×\$50/hour) for city Brownfield Programmatic Brownfield contractor (SETDD) to complete tasks related to Community Outreach (Meeting preparation, authorship of community outreach written materials and meeting attendance).

Task 2-Cooperative Agreement and Project Management-\$13,000 total

-Personnel Costs- costs include \$2,500 (50 staff hours×\$50/hour) for city staff time related to helping city brownfield contractor (SE TN Development District) with Program Management (all EPA Cooperative Agreement Compliance Reporting), which includes: completing 12 Quarterly Reports, 1 MBE-WBE Reporting, 12 ACRES Reporting Periods, Community Engagement Plan, 1 Final Report and 1 Closeout Documentation.

-Contractual- Costs include \$10,500 (210 staff hours×\$50/hour) for city Brownfield Programmatic Brownfield contractor (SETTD) to complete tasks related to Program Management (all EPA Cooperative Agreement Compliance Reporting), which includes: completing 12 Quarterly Reports, 1 MBE-WBE Reporting, 12 ACRES Reporting Periods, Community Engagement Plan, 1 Final Report and 1 Closeout Documentation.

Task 3 –Remedial Planning, Design, Observation, Monitoring Near Sensitive Populations, Remedial Action Report-\$94,000 total

-Contractual to Qualified Environmental Consultant- Contractual: Health Monitoring, Environmental, Preliminary Design, Observation and Remedial Action Report (752 hours @ average of \$125/hr.=\$94,000)

Task 4 – Cleanup Activities Budget-\$473,000 total (\$373,000-grant; \$100,000-Cost Share)

<u>Budget Item/Category</u>	<u>Work Being Done</u>	<u>Number</u>	<u>Unit of Measurement</u>	<u>Unit Price</u>	<u>Total Amount</u>
1) Establish Clean Utility Corridor (excavate and replace with clean soil)	Soil Excavation and Replacement	25,360	Square Feet	\$1.00	\$25,360
2)Trail Head Area Cleanup Work (excavate and replace with clean soil)	Soil Excavation and Replacement	38,462	Square Feet	\$1.00	\$38,462
3) Supplement Cap within Railroad Right of Way (excavate and replace with clean soil)	Soil Excavation and Replacement	409,178	Cubic Yards	\$1.00	\$409,178
TOTAL CLEANUP COSTS					\$473,000

Task 5 – Brownfields Training Conferences: Travel: 2 staff x 3 conferences (during the life of grant) at \$2,500 each conference (registration \$500, Airfare: \$1,000, 3 nights hotel \$1,000) = **\$15,000**

d. Measuring Environmental Results-The City of Chattanooga will track the cleanup activities (cleaning up of 9.88 acres of land, which can be described as one of the Outputs of the project) throughout the 3-year grant period of the project. The City of Chattanooga (in consultation with the Southeast Tennessee Development District and the city’s selected environmental engineering consultant) will track the progress, by holding weekly meetings or conference calls, to track the progress of the work associated with the grant. Also, the city will use ACRES and EPA quarterly reporting to track the project’s progress. Once the actual cleanup work begins, the city’s environmental engineering consultant will perform the construction engineering inspection (CEI) work on the project. The project outputs, outcomes and tracking methods are as follows:

<p><u>Task 1: Community Engagement</u></p> <p><u>Output(s):</u> 24 community meetings; meeting presentations and flyers available on the community outreach website and at each meeting</p> <p><u>Outcomes:</u> informed, engaged community</p> <p><u>Tracking Methods:</u> sign-in sheets; city’s project website hits; Public Hearing Attendance.</p>
<p><u>Task 2-Cooperative Agreement and Project Management</u></p> <p><u>Output(s):</u> 12 Quarterly Reports, 1 MBE-WBE Reporting, 12 ACRES Reporting Periods, Community Engagement Plan, 1 Final Report and 1 Closeout Documentation.</p> <p><u>Outcomes:</u> Successful Grant Compliance</p> <p><u>Tracking Methods:</u> Evaluate Progress against Work Plan, in order to assure progress is being made and project kept on schedule.</p>
<p><u>Task 3: Cleanup Engineering and Engineering Inspection</u></p> <p><u>Outputs:</u> QAPP; waste manifest; Compliance Status Report (CSR); ACRES reporting</p> <p><u>Outcomes:</u> Accountability for use of public funds and confirmation that site meets regulatory cleanup standards</p> <p><u>Tracking Methods:</u> Environmental documentation within eight-week deliverable timeframe; provide copy of deliverable to EPA; grant administration tasks tracked on internal report.</p>
<p><u>Task 4: Cleanup Activities</u></p>

Output(s): Interim Compliance Status Report; Interim Remediation Report; No Further Action (NFA) letter from TN Department of Environment and Conservation

Outcomes: Cleaned up brownfield site; Reduction of environmental and public health risk; reuse of project site

Tracking Methods: Construction schedule; evaluate progress against milestones at weekly meetings; waste manifest; daily monitoring during remediation by the qualified environmental consultant and by City ECD staff.

Task/Activity 5: Brownfield Training Conferences

Outputs: Two City ECD staff will attend three brownfields-related training conferences

Outcomes: City ECD effectively manages brownfields projects

Tracking Methods: Annual professional development budget expenditures

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Programmatic Capability-i. Organizational Structure- A highly competent and experienced staff is in place at the City of Chattanooga to implement and manage the proposed project. In addition, the project team includes a contract programmatic lead (Mr. Sam Saieed-SE TN Development District) and an environmental engineering consultant. Both consultants will be selected by a competitive procurement process. There are 3 key individuals employed by the city to provide the expertise necessary for the implementation and management of all grant functions and activities. There are 3 key individuals employed (or contracted by the city) to provide the expertise necessary for the implementation and management of all grant functions and activities. Ms. Dwan Austin will be the city's project lead, while reporting directly to Mr. Freeman regarding the project.

ii. Description of Key Staff

Ms. Dwan Austin, City of Chattanooga Brownfield Coordinator: Ms. Austin has over 25 years' experience in project and program development and implementation. Ms. Austin will serve as technical advisor to the Project Lead.

Mr. Jermaine Freeman, City of Chattanooga-Assistant Director of Economic and Community Development: Mr. Beeland has 20 years' experience in program and project development and implementation and agency management. Mr. Beeland will provide management and oversight to the project, by working with Mr. Saieed and the engineering consultant on tracking project programmatic and budgetary outcomes.

Mr. Sam Saieed, SETDD-Assistant Director of Community Development/ Brownfield Director- Mr. Saieed will serve as the Brownfield Coordinator for the project. He has administered more than 150 economic and community development projects and programs. He will be charged with the implementation and management of the Brownfield grant project activities and tasks.

ii. Acquiring Additional Resources-The City of Chattanooga has a Brownfield Programmatic Consultant (Southeast Tennessee Development District/ Chattanooga Area Regional Council of Governments-which is a special purpose unit of government, created by TN State law and does not have to be procured to enter into intergovernmental agreements, per Tennessee Code Annotated § 13-14-106) and will procure an Environmental Engineering Consultant, using a competitive bid process as set out by EPA.

b. Past Performance and Accomplishments-i. Has Previously Received an EPA Brownfield Grant

1. Accomplishments- The City of Chattanooga has received previous EPA Brownfield Grants. Specifically, the city's 2010 Petroleum Assessment Grant had the following outputs: 8 Phase I Assessments, 2 Phase Assessments, 8 Community Outreach Activities, and a satisfactory grant compliance record. The City's 2010 Cleanup Grant had the following outputs: cleanup of two brownfield sites (Old 36th Street Landfill and TN Ave./ Railroad Overpass Property), 12 Community Outreach Activities and a satisfactory grant compliance record. The city's 2008 Cleanup Grant had the following outputs: cleanup of one brownfield site (Old Chattanooga Glass Company), 12 Community Outreach Activities and a satisfactory grant compliance record. All of these accomplishments are reflected in the EPA's ACRES database.

2. Compliance with Grant Requirements- The City of Chattanooga has complied with all workplans, schedules, and terms/conditions on all of their previous closed-out EPA Brownfield Grants. The city has one EPA 2017 Cleanup Grant that is currently open and no assessment grants currently open. The city has submitted all quarterly reports and other required reports in a timely manner. The city is on track to successfully complete this cleanup grant in a timely manner, while following all EPA rules and regulations. The grant period for the active cleanup grant is October 1, 2017 until September 30, 2022. The city is currently tracking the progress of the grant and have submitted all required materials in a timely manner.

City of Chattanooga FY2022 Brownfields Grant Proposal for Cleanup-Funds-Threshold Criteria

1. Applicant Eligibility

Eligible Entity-The City of Chattanooga is eligible as a General-Purpose Unit of Local Government.

2. Previously Awarded Cleanup Grants

The proposed site (City of Chattanooga-owned abandoned rail corridor) has not received funding from a previously-awarded EPA Brownfield Cleanup Grant.

3. Expenditure of Existing Multipurpose Grant Funds

This section is not applicable, because the City of Chattanooga has never been awarded an EPA Brownfield Multipurpose Grant.

4. Site Ownership

The City of Chattanooga holds fee simple title and is sole owner of the property identified for purposes of this cleanup proposal as the Abandoned Rail Corridor. The Deed is recorded in the Hamilton County Courthouse, Register of Deeds, Parcel # 155G_B_006.01. The City of Chattanooga will retain sole ownership of this property throughout the performance period of the grant until all grant closeout activities have been completed.

5. Basic Site Information

- | | |
|--------------------|--|
| (a) Site Name: | Abandoned Rail Corridor-Future Alton Park Greenway Extension |
| (b) Address: | 3225 Broad Street, Chattanooga, TN 37408 |
| (c) Current Owner: | City of Chattanooga, Tennessee (the Applicant) |
| (d) Acquisition: | N/A – the Applicant owns the property |

6. Status and History of Contamination at the Site

- a) The site is contaminated predominantly by hazardous substances.
- b) The site operated as an active rail line and is now an abandoned rail corridor
- c) Environmental concerns include: Documented onsite impact from PAHs, PCBs, lead and arsenic in foundry sand and soil; Historical onsite operations of rail lines from at least 1917 to the 1980s; Observed presence of fill (foundry sand and clayey soil) from an undocumented source, along the eastern and central segments of the subject property; Observed oily staining on remnant rail ties and associated burned wood in one location at the eastern segment of the subject property.
- d) **Documented onsite impact from PAHs, PCBs, lead and arsenic in foundry sand and soil** represents an impact to the subject property and, in our opinion, is a *recognized environmental condition*. **Historical onsite operations of rail lines from at least 1917 to 1980's-** Based on the nature and duration of operations of rail lines, there is potential for undocumented spills of petroleum and/or hazardous solvents to have occurred at some point in its operational history. Given that volatile organic compounds were not

analyzed in soil or groundwater during the most recent assessment by S&ME, it is not currently known if these exist at the subject property. As such, in our opinion, past operations at the subject property is a *recognized environmental condition* and a *vapor encroachment condition*. **Observed presence of undocumented fill (foundry sand and clayey soil) along the eastern and central segments of the subject property and oily staining on remnant rail ties and associated burned wood in one location at the eastern segment of the subject property** represents a potential impact to soil associated with contaminants that may be present in foundry sand and soil in the eastern and central segments of the subject property and the oily staining observed on the remnant rail ties in the eastern segment of the subject property. In our opinion, the presence of undocumented fill and the oily staining are a *recognized environmental condition*. **Moderate amounts of household garbage observed in the central segment of the subject property along West 33rd Street** appeared to be consistent with household waste debris. In our opinion, the observed household garbage represents a *de minimis condition*.

7. Brownfield Site Definition- The subject site:

- a) Is not listed on the NPL.
- 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 US Government

8. Environmental Assessment Required for Cleanup Grant Proposals

A Phase II Draft Report was completed on January 14, 2019. A Phase I was completed on November 17, 2017. An ABCA was completed on January 14, 2019. The City of Chattanooga (and the site) and the State of Tennessee's (TN Department of Environment and Conservation) entered into a Brownfield Voluntary Agreement (entered into the State Voluntary Brownfield Program on February 8, 2018).

9. Enforcement or Other Actions

The City of Chattanooga affirms that there are no known ongoing or anticipated environmental enforcement or other actions related to the site for which Brownfield Grant funding is sought.

10. Sites Requiring a Property-Specific Determination

The City of Chattanooga affirms that the subject property does not need a Property-Specific Determination.

11. Threshold Criteria Related to CERCLA

- a. The City of Chattanooga is eligible for a Brownfields Cleanup Grant to address Hazardous Substances at a Brownfield Site, because they meet the requirements for asserting an affirmative defense to CERCLA liability through one of the landowner

liability protections (through Bona Fide Prospective Purchaser Liability Protection

- The City of Chattanooga acquired the property on January 26, 2018.
- The City of Chattanooga conducted AAI prior to acquiring the property. The Phase I was completed on November 17, 2017.
- The City of Chattanooga is not liable for any contamination at the site or affiliated with any person potentially liable for the contamination.
- All disposal of hazardous substances at the site occurred before the city acquired the site.
- The City of Chattanooga has exercised 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 Chattanooga has and will continue to comply with any land use restrictions and has not nor will impede the effectiveness or integrity of any institutional controls associated with response actions at the site.
- The City of Chattanooga has and will continue to provide full cooperation, assistance and access to authorized persons.
- The City of Chattanooga has and will continue to comply with any CERCLA information requests and administrative subpoenas and provide all legally required notices with respect to the discovery or release of any hazardous substances found at the site.
- The City of Chattanooga has not and will continue to not impede performance of a response action or natural resource restoration.

The City of Chattanooga meets the requirements of the BFPP CERCLA liability protection:

a) Information on Property Acquisition

- i) The City of Chattanooga acquired the property on January 26, 2018 by purchase from the Land Trust for Tennessee.
- ii) The City of Chattanooga acquired the property on January 26, 2018 by purchase from the Land Trust for Tennessee.
- iii) The City of Chattanooga is the sole owner of the property and owns the property via a Fee Simple title.
- iv) The City purchased the Property from the Land Trust for Tennessee
- v) The City of Chattanooga has no familial contractual or financial relationship or affiliations with all prior owners or operators or potentially responsible parties.

b) Pre-Purchase Inquiry

- i) The Land Trust for Tennessee contracted with S&ME Inc. to perform the Phase I (per ASTN E1527-13 guidelines). The Phase I was completed on November 17, 2017.
- ii) S&ME Inc. (specifically Pat Gribben (PG) and Johanna Heywood (PE, PG) performed the Phase I.
- iii) The Phase I was performed less than 180 days prior to the City of Chattanooga purchasing the property.

- c) The City of Chattanooga affirms that all disposal of hazardous substances at the site occurred before the city acquired the property and the city did not cause or contribute to any release of hazardous substances at the site. The City of Chattanooga did not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.
- d) There have been no users of the abandoned rail corridor since the City of Chattanooga has purchased the property. The abandoned rail corridor is a vacant piece of property.
- e) **Continuing Obligations**
 - i) The City of Chattanooga has taken all appropriate steps to stop any continuing releases.
 - ii) The City of Chattanooga has taken all appropriate steps to prevent any threatened future releases.
 - iii) The City of Chattanooga has taken all appropriate steps to prevent or limit exposure to any previously-released hazardous substances.

Commitments

The City of Chattanooga commits to:

- i) comply with any land use restrictions and not impede the effectiveness or integrity of any institutional controls.
- ii) assist and cooperate with those performing the cleanup and provide access to the property.
- iii) comply with all information requests and administrative subpoenas that have or may be issued in connection with the property.
- iv) provide all legally required notices.

12) Cleanup Authority and Oversight Structure

- a. The TDEC Division of Remediation has been involved with this site for many years. In an effort to support the City's redevelopment efforts and to ensure that site redevelopment is performed in accordance with applicable regulations, TDEC prepared a Brownfield Voluntary Agreement (#33-770). The BVA lists the actions to be taken during remediation and construction to ensure the cleanup is protective of human health and the environment. The City of Chattanooga's Brownfields Project Manager will oversee and manage the overall cleanup project, but the design and implementation of the appropriate remediation system will be contracted out to a qualified environmental consultant and contractor. The City has a standard procurement process in place through the City's Purchasing Department to hire the best qualified environmental consultant. The procurement includes a Request for Qualifications published in the local newspaper and on the Purchasing Department's website, a thorough panel review of all submitted qualifications packets, candidate firm interviews if appropriate, and subsequent contract negotiations.
- b. The described access is not needed on this project.

13) Community Notification

The City of Chattanooga placed a notice on its website and published in the Chattanooga Times Free Press on October 8, 2021. Residents were notified of the city's intent to apply to the United States Environmental Protection Agency for a \$500,000 grant to clean up the abandoned rail corridor. The notice informed the public of the availability of the draft grant application for review, along with a document outlining cleanup alternatives (the ABCA), and invited comments on the documents. A notice also invited the public to a meeting to be held on October 28, 2021 at 4:00 PM where the project would be discussed, the draft grant application and ABCA would be available for review, and comments from the public were welcome. The following documents were available for public viewing

- A copy of the draft ABCA is attached to the proposal and includes the Brownfields Voluntary Agreement.
- A copy of the public notice(s) is attached to the proposal.
- A copy of the public meeting sign-in sheet is attached to the proposal.
- A summary of the comments received, and corresponding responses is attached to the proposal.

A summary of the public meeting is attached to the proposal (including the Presentation)

14) Statutory Cost Share

- a) The City of Chattanooga has budgeted their required \$100,000 Cost Share as a part of their Department's FY2022 Budget.
- b) The City of Chattanooga is not requesting a Cost Share Waiver.

15) Waiver of \$500,000 Limit

This section is not applicable, as the City of Chattanooga is not requesting the waiver.

16) Named Contractors and Subrecipients

No procurement has occurred yet. However, all procurement will take place after the grant award and will comply with 2 CFR § 200.319(b) requirements.