



Town of Great Falls

R04-22-C-009

PO BOX 177
810 DEARBORN STREET
GREAT FALLS, SOUTH CAROLINA 29055

803.482.2055
FAX 803.482.6767

1. Applicant Identification: The Town of Great Falls
810 Dearborn Street
Great Falls, SC 29055
2. Funding Requested:
 - a. Grant Type: Single Site Cleanup
 - b. Federal Funds Requested:
 - i. \$309,523, with cost share waiver
 - ii. Requesting a cost share waiver
 - iii. Not requesting a \$500,000 limit waiver
3. Location:
 - a. Great Falls
 - b. Chester County
 - c. South Carolina
4. Property Information:

Former CSX Rail Bed

There is no street address. The 3.5-mile bed of the former CSX rail line runs from a wooded area just north of the Town near Fishing Creek, through one of the mill villages along Seaboard Street and crossing Center Street, along the east of downtown in an undeveloped area adjacent to the Catawba River and the western bank of Great Falls Lake, and terminating just south of the former Republic Mill #1 property on the southeastern end of Great Falls near the intersection of Republic Street and Farrow Street. The majority of this trail, and all proposed cleanup activity, falls within the Great Falls Town limits 29055) and Census Tract Block Group 021000-2. Great Falls, NC 29055
5. Contacts:

Project Director:
The Honorable Glenn Smith, Mayor pro tempore
Address: 810 Dearborn Street, Great Falls, SC 29055
Phone: 803 482-2055, Town Hall; 803 413-5747, mobile
Email: [REDACTED]

Chief Executive:
The Honorable Lee Montgomery, Mayor
Address: 810 Dearborn Street, Great Falls, SC 29055
Phone: 803 482-2055, Town Hall; 803-482-4155, mobile
Email: greatfalls@truvista.net
6. Population: (data from www.census.gov, 2020)
Great Falls: 1,951

7. Other Factors Checklist:

Other Factors	Page #
Community population is 10,000 or less.	1
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
The priority brownfield site(s) is impacted by mine-scarred land.	
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the project/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation.	3
The priority site(s) is adjacent to a body of water (i.e., the border of the priority site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	1
The priority site(s) is in a federally designated flood plain.	
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	
The reuse of the priority site(s) will incorporate energy efficiency measures.	
30% or more of the overall project budget will be spent on eligible reuse/area-wide planning activities for priority site(s) within the target area.	
The target area(s) is located within a community in which a coal-fired power plant has recently closed (2011 or later) or is closing.	

8. Letter from the State or Tribal Environmental Authority:
Attached

9. Releasing Copies of Applications:
This application does not have confidential, privileged, or sensitive information.



November 12, 2021

Brian Gross
Region 4 Brownfields Coordinator
United States Environmental Protection Agency
Resource Conservation and Restoration Division
61 Forsyth Street SW
Atlanta, Georgia 30303-8960

RE: EPA Brownfields Cleanup Grant
Town of Great Falls, South Carolina

Dear Mr. Gross:

The South Carolina Department of Health and Environmental Control, the State's environmental authority, acknowledges and fully supports the Town of Great Falls' application for a Brownfields Cleanup Grant. The grant will facilitate cleanup of sections of the 3.5-mile former railroad that the Town is transforming into the Great Falls Rail Trail.

The Department appreciates your consideration of the application and hopes for a favorable outcome. Your positive response will assist the Town in its efforts to revitalize properties in the community. If you have any questions or need additional information, please contact Robert Hodges of my staff at (803) 898-0919.

Sincerely,

Henry Porter, Chief
Bureau of Land and Waste Management

cc: Liz Basil, BEHS
Robert Hodges, Manager, Brownfields Program

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

a. Target Area and Brownfields

i. Background and Description of Target Area

In an early history of South Carolina published in 1809, David Ramsey noted the beauty of the Catawba Falls, stating “Nothing in South Carolina is equal to the (Great) Catawba falls,” and “The scenery is sufficiently grand and curious to attract the visits of the most distant inhabitants of Carolina”.

The Town of Great Falls is small community located in Chester County along the Catawba River, just west of the picturesque Catawba Falls in South Carolina. J.B. Duke, owner of what became Duke Power, built hydroelectric plants, three Republic Cotton Mills, and three mill villages here. The mills opened between 1910 and 1923, drawing workers in from the countryside. The company built roads, shops, schools, water and sewer systems, and a theater for the town. The site was an ideal location for mill operations located on the Catawba River and in the heart of an agricultural region with a strong cotton industry.

J.P. Stevens employed around 1,700 workers when it bought the mills in the 1940s, but by the mid 1980s the mills were shuttered as the textile industry shifted to overseas production. The railroad ceased operations at this time, and by the late 1980s the rails and rail ties were removed by CSX. After the mills closed, the community suffered from population decline and the closing of commercial businesses. US Census data shows the town population declined from 3,553 in 1950 (near the height of operations) to 1,951 in the last count (2020) – a decline of over 40%.

The focus of this application is a 3.5-mile rails-to-trails greenway project on the former rail line running from a wooded area just north of town near Fishing Creek, through one of the mill villages along Seaboard Street and crossing Center Street, along the east of downtown in an undeveloped area adjacent to the Catawba River and the western bank of Great Falls Lake, and terminating just south of the former Republic Mill #1 property on the southeastern end of Great Falls near the intersection of Republic Street and Farrow Street. The majority of this trail, and all proposed cleanup activity, falls within the town limits and Census Tract Block Group 021000-2. Cleanup activities are focused on the mill village section of the trail and three other distinct areas of concern. The mill village community is comprised of mostly low-income rental housing and a church.

ii. Description of the Proposed Brownfield Site(s)

The former rails and rail ties have been removed throughout the 3.5-mile abandoned CSX rail bed (approximately 42 acres), and no structures remain. The rail bed is currently accessible by foot and/or all-terrain vehicle (ATV) with small stretches of heavily overgrown vegetation and downed trees. The Site is continuously accessible with the exception of four (4) significant “wash-outs” impacting a total of no more than 200 feet of the former rail bed. A Phase II Environmental Site Assessment (ESA) conducted in April 2021 identified heightened levels of Arsenic, Aluminum, Cobalt, Iron, Antimony, Manganese, Vanadium [metals]; and Benzo(a)anthracene, Indeno(1,2,3-cd) pyrene, Benzo(b)fluoranthene, dibenz(a,h)anthracene, and Benzo(a)pyrene [polycyclic aromatic hydrocarbons (PAHs)] at the four areas of concern. Contamination by PAHs exists intermittently along surface soils. Contaminant concentrations in soil at the vicinity of the former mill village (an approximate 1,100 linear foot stretch of trail between North Street and Center Street) is the main area of concern for cleanup activities. These residents have direct and uninhibited access to the contaminated land that the runs – literally – through their backyards. Three other distinct areas of concern in the wooded section of the trail total approximately 90 linear feet. Privately owned homes are approximately 50 feet from the center line of the rail bed. After entering into Voluntary Cleanup Contract 20-7552-NRP with the South Carolina Department of Health and Environmental Control (SCDHEC), effective date April 12, 2021, Great Falls took ownership of this property in July 2021.

b. Revitalization of the Target Area

i. Reuse Strategy and Alignment with Revitalization Plans

Redevelopment of this property is a critical piece in our community's economic development plans. While the beauty of Great Falls has been known for centuries, only after the mills had closed did the people realize what the significance of that beauty could mean for the Town's economy. Residents first identified tourism as priority in a 2000 design charrette, involving more than 200 residents, conducted by the Great Falls Home Town Association (GFHTA). The charrette produced a vision for Great Falls to integrate the existing recreational assets of the area (the Catawba River, the Falls, Great Falls Lake, and their recreational amenities) with the Town through the development of the rail trail and park/greenspace on brownfields sites. These connections will provide greater access to the recreational amenities to residents, and bring tourists into Town for shopping, dining, and lodging. The Town, GFHTA, and other community partners have been working toward this goal for over 20 years since. In 2019, a study, conducted with grant funding by Clemson University entitled "Research and Technical Assistance to support Nature-Based Tourism (NBT) Destination Development Strategies for Great Falls," surveyed 300+ residents and area visitors at local festivals and validated the demand for NBT.

As a part of its federal relicensing of the dams and power plants in the area, Duke Energy (Duke) recently entered into Duke Energy Catawba-Wateree re-licensing agreement, which will further enhance the NBT amenities associated with the river and the hydroelectric dam lake. The agreement includes plans for a new canoe/kayak launch to provide access to class 4 and 5 rapids, new portage trails, and a lease and up to \$1 million to support the South Carolina Department of Parks, Recreation, and Tourism (SCDPRT) effort to build a new state park on a series of islands in the river. This new investment and commitment to NBT by Duke and the State of South Carolina bolsters and aligns with our community's vision to leverage these assets to revitalize the Town.

The community's commitment to revitalization has been reinforced through other community planning events and redevelopment initiatives, such as those conducted by the Catawba Regional Council of Governments (Catawba COG) under an EPA Brownfields grant. The grant funded environmental assessments of Republic Mill #1 and #2 sites. The subject property for the rails-to-trails project is adjacent to Republic Mill #1's eastern boundary, and travels through the mill village associated with Republic Mill #2. The assessments led the Town to pursue funding for cleanup; and, in 2021, the Town received a Community Development Block Grant (CDBG) of \$500,000 along with a \$126,000 sub-grant from the South Carolina Department of Health and Environmental Control (SCDHEC)'s Brownfields Cleanup Revolving Loan Fund (BCRLF) for Republic Mill #1. With that funding and a \$50,000 match contributed by the Town, we will clear Republic Mill Site #1 of asbestos contaminated materials and building debris. Our plan is to transform the blighted, former mill site into a greenspace park to support the other outdoor recreational opportunities being developed here. With access to the Catawba River, the site will provide access to rafting, kayaking, fishing, and hiking as well as access to the planned rail trail.

In addition, using one cent sales tax funding provided by Chester County, Great Falls is redeveloping the nearby former company store of the Republic Mills to become a Visitor's Center. Great Falls is also working with the Katawba Valley Land Trust and Duke to design a history center to be constructed on the ruins of the Nitrolee Fertilizer plant, which is located by the waterfall, where Fishing Creek flows into the Catawba River at the northern end of this planned 3.5-mile rails-to-trails project.

The December 2019 Strategic Plan for Great Falls, authored in conjunction with the Chester County Strategy Plan, documents these efforts and the vision of the community. Converting the subject property into a 3.5-mile trail aligns with this Strategic Plan, and the rails-to-trail project is the key to linking all of these efforts (Duke's enhancements, Republic Mill #1 park, visitor's center, history center, etc.) together. The trail will also connect the Town to a wider, multi-state network of trails, called The Carolina Thread Trail (CTT), which crosses 15 counties in South Carolina and North Carolina. With the cleanup funding provided by this project, the Great Falls

trail will be developed and become the CTT's southern terminus. CTT set this connector as its highest priority for trail expansion.

ii. Outcomes and Benefits of Reuse Strategy

According to the U.S. Census Bureau, only 23.7% of Great Falls residents work in Chester County and only 14.7% work in Great Falls, with a mean commute time for 28.7 minutes (2019 ACS). Many residents travel to Rock Hill (30 min), Columbia (50 min), or Charlotte (60 min). Creating local employment is key to stopping the exodus of residents which is driving the long-term population decline. The exodus began with the loss of the manufacturing jobs after the closure of the Republic Mill plants, leaving the Target Area as a disadvantaged community. According to the EPA's EJScreen Mapping Tool, the population in the Target Area (Block Group 021000-2) consists of higher percentage of low income (72%) and a higher percentage of people of color (43%) than the state average (36% for both). The Target Area also has a higher percentage of the population with less than a high school diploma (16%) than the state average (13%). The Town's revitalization strategy is to stimulate the local economy to create new jobs and attract new residents as well as develop new, attractive healthy-lifestyle amenities for both new and existing residents of the Target Area.

Our strategy is to transform Great Falls into a tourist destination for urbanites escaping the hectic lifestyle in business cities, such as nearby Charlotte, NC and Columbia, SC. These tourists will seek out services from Great Falls businesses, such as biking and kayaking outfitters, lodging at area hotels and bed-and-breakfast properties, restaurants, and supporting commercial enterprises. In 2007, Econsult Corporation completed a study which projected many economic benefits of the proposed CTT, including enhanced property values and local property tax revenues, increased tourism, enhanced and expanded business communities, and increased local investment from trail construction activities.¹ The study predicts an average increase of 4% in property values in communities on the CTT, and an \$84,000 to \$168,000 per mile in new tourism spending annually (potentially \$294,000 to \$588,000 per year for Great Falls). The predicted creation of new trail and tourism-related businesses will generate new local jobs for the Target Area. Plus, industry professionals and site selection firms stress the significance of greenspace and trails for business development and attraction. Recently, after learning about the Town and Duke's plans, a company located in the Charlotte region contacted the Town to discuss the possibility of moving their headquarters and some manufacturing operations to Great Falls. Discussions are still in the early stages, but the conversation would likely not have begun without the Town's revitalization strategy.

The cleanup and redevelopment of the 3.5-mile former rail bed will benefit the Target Areas disadvantaged community by providing a new recreational opportunity for the community and visitors, while also generating an economic impact that will create jobs and attract new investment in the Target Area. The cleanup grant will ensure the redevelopment is safe for reuse and protective of human health by implementing engineering controls to prevent exposure.

c. Strategy for Leveraging Resources

i. Resources Needed for Site Reuse

As a general purpose unit of local government, the Town of Great Falls is eligible for numerous state and federal grants and loans. We have already secured funding for vegetation removal (downed trees, shrubbery growth, etc.) and trail development (infill, signage, landscaping, etc.). The SCDPRT provided us with a \$100,000 grant for this work (award letter attached), and we will match this grant with \$25,000 of in-kind labor provided by community volunteers, donating labor hours for trail development activities. However, in order to be protective of the health of the volunteers and in accordance with the VCC with SCDHEC, the volunteer work and these funds cannot be used until the cleanup is complete to prevent potential exposure to

¹ "The Proposed Economic Impacts of the Propose Carolina Thread Trail." Econsult Corporation, March 2007.
https://www.carolinathreadtrail.org/wp-content/uploads/2018/08/CTT_Economic_Study.pdf

contaminants. While no additional funding needs are anticipated for the cleanup, in the event additional funding is needed, the Town can request a loan or grant from the SCDHEC BCRLF, since the site is under a VCC. Plus, the Town is committed to pursuing other sources of funding to further develop and continuously improve the trail and other recreational amenities in Town. For example, the Town is currently managing \$500,000 in CDBG funding to remove asbestos and debris from the Republic Mill #1 site, and using sales tax money to develop a visitor's center. The Town will also work with our private and community partners, such as Duke and GFHTA, to secure the funding to achieve the goals detailed in the 2019 Strategic Plan.

ii. Use of Existing Infrastructure

The project will use the existing berms from the former rail bed to install the engineered cap and create the rail trail. Existing RR crossing breaks across roadways will be maintained. The trail will access existing roadways and connect to existing sidewalks in the Town. No other infrastructure needs or upgrades are anticipated.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

a. Community Need

i. The Community's Need for Funding

Great Falls is a small community of 1,951 people (US Census 2020), few employers, and a very limited tax base. Approximately 22% of homes in town are vacant (US Census 2020). Great Falls has a poverty rate of 22.5% and a child poverty rate nearly 40%; median household income is \$41,852; and a mean per capita income of \$19,209 (US Census, 2019 ACS). These are all well below state averages. SC's median household income, for example, is \$53,199 (27% higher) and the state's mean per capita income is \$29,426 (53% higher), while its poverty rate is only 13.8% (US Census, 2019 ACS). With the taxes and allocations we receive, we meet our budget and maintain the minimal amount of reserve required by the State of SC and our auditors. We make adjustments to our budget for it to balance. Therefore, with our small population and low-incomes, the town is unable to fund the remediation without grant assistance.

We must rely on external sources of funding, such as grants, for the assessment and remediation of the environmental contamination at local brownfields properties. Without grants we cannot make needed improvements to our Town to attract people and businesses. For example, the environmental assessments associated with the Republic Mills properties were funded by the Catawba COG's EPA brownfields grant. The brownfields grant also paid for the Phase I ESA for the subject property for the rail trail, while the Phase II ESA was funded by a grant from the ARRAS Foundation.

ii. Threats to Sensitive Populations

(1) Health or Welfare of Sensitive Populations: The EPA EJSCREEN Tool indicates that Census Block Group 021000-2 has very high concentrations of sensitive populations including low income populations (state percentile 94%) and children under 5 years of age (state percentile 97%). The rail bed runs directly through one former mill village and adjacent to several other residential areas with these sensitive populations. Low income residents and neighborhood youth access the former railway as a walking path along the eastern portion of the town. These sensitive populations are risking exposure to contaminated soils containing elevated levels of metals and PAHs. Long-term exposure to these types of contaminants can lead to an increased risk of cancer (lung, skin, bladder), kidney and liver damage, birth defects, immune system dysfunction, nervous system disorders and muscular/neurological degenerative processes similar to Alzheimer's disease, muscular dystrophy, Parkinson's disease, and multiple sclerosis.² This project will enable the Town to install an engineered cap over the contaminated soils to prevent exposure and eliminate the risk to the pedestrians and the health consequences for the sensitive population.

² Agency for Toxic Substances and Disease Registry. <http://atsdr.cdc.gov>

In addition, the trail will provide safe access to recreational opportunities and promote healthy exercise for community residents. According to the most recent data available from SCDHEC (2016-2018, <https://gis.dhec.sc.gov/chp/>), Chester county residents scored very poorly in reported leisure physical activity - ranking 41st among the state's 46 counties - a higher than average rate of adult obesity 37%, and comparably high rates of asthma (44 of 46 counties), stroke (45 of 46), and heart attack (40 of 46). All of these conditions can be improved with regular cardiovascular exercise. The *Chester County Live Healthy Community Health Plan 2019-2023* identified obesity as the county's second highest health concern in a community survey (cited by 45% of respondents) - second only to drug use - and found that 33.5% of all county residents are obese (<http://umrhn.org/wp-content/uploads/2021/06/Final-CHESTER-CHIP-5.26.21.pdf>). The trail and related eco-tourism opportunities will not only promote economic development in the Target Area but improved community health as well.

(2) **Greater Than Normal Incidence of Disease and Adverse Health Conditions:** The EPA EJSCREEN Tool indicates that Census Block Group 021000-2 has very high levels of lead based paint exposure (state percentile 99%) and wastewater discharge (state percentile 96%) and relatively high levels of Cancer Risk (70-80th USA Percentile) and Respiratory Risk (70-80th USA Percentile). A *Community Cancer Assessment* conducted by SCDHEC for the zip code encompassing Great Falls (29055) over the period from 2014 to 2018 found heightened levels of cancer – 121 incidents were expected while 162 were observed; 45 deaths were expected and 59 were observed. These high levels of cancer were in biological areas that can be impacted by metals and PAH contamination, including the lungs and kidney. These types of contamination from former mill sites and the railroad may be a contributing factor to making Chester County the second highest county in cancer incidence in South Carolina – with a rate of 498 incidents of cancer per 100,000 population over 5 years – and 4th highest in cancer mortality. Lung cancer was reported as Chester County’s most commonly diagnosed cancer and leading cause of cancer death during the reporting period. Again, lung cancers are a possible outcome of long-term exposure to the types of metals and PAH’s found in the soil for our site. Exposure to airborne particulates, such as wind-blown contaminated soils, may also contribute to and/or complicate asthma and other respiratory diseases in the Target Area. The population in the Target Area’s ZIP code (smallest geography available) experience a higher rate of hospital visits for asthma-related problems compared to the rate for the State – 41.5 per 10,000 residents in ZIP code 29055 versus 38.8 for SC. Installing the protective barrier between the contaminated soils and local residents is essential to protecting the Target Area residents and future visitors from these risks.

(3) **Promoting Environmental Justice:** The EPA EJSCREEN Tool indicates that Census Block Group 021000-2 has a heightened concentration of people of color (43% in Target Area vs. 36% in SC and 39% in US), a significantly higher percentage of low income population (72% vs. 36% in SC and 33% in US), a higher population with less than a high school education (16% vs. 13% in SC and 13% in US), and a significantly higher percentage of population under age 5 (14% vs. 6% in SC and 6% in US). This disadvantaged community in our Target Area disproportionately live with the negative impacts from the legacy environmental contamination associated with the historical railroad and mill operations. The mill village homes were built in close proximity to the mill sites, so workers could easily walk to the mill. The railroad was crossed through the middle of the mill village in order to reach the mill. As a result, the Target Area population continues to be burdened with this environmental legacy within and surrounding their community; and, as the previous sections describe, residents continue to be at risk from exposure to legacy contamination. The following table with EJSCREEN data shows the Target Area ranks above the median (in the 68th or higher percentiles for the state and US) in all EJ Indices and near the top for two:

EJ Index:	%ile in State	%ile in US
Particulate Matter (PM 2.5)	69 th	68 th
NATA Air Toxics Cancer Risk	69 th	79 th
NATA Respiratory Hazard Index	69 th	70 th
Lead Paint Indicator	94 th	86 th
Wastewater Discharge Indicator	97 th	95 th

This project will promote environmental justice and support the Target Area population that disproportionately share the negative environmental consequences from the historical industrial operations in the community by first mitigating the Target Area’s risk of exposure to contaminated soils (particulate matter, air, and respiratory hazards) on the former rail bed running through their backyards. The development of the rail trail and the other recreational amenities in the area will attract new investment to stimulate the Target Area’s economy. Improving economic conditions will enable Target Area residents and property owners to reinvest and improve mill village homes to eliminate lead-based paint risks. Overall, the rail trail project and the other goals of the 2019 Strategic Plan for Great Falls will help create a healthier community with more economic opportunities for all residents of the Target Area.

b. Community Engagement

i. & ii. Project Involvement & Roles

Organization	Point of Contact	Assistance/Involvement
Carolina Thread Trail	Bret Baronak, Director 704-376-2556 ext. 2216 bret@catawbalands.org	Provided trail design for the Great Falls segment and will extend technical help with trail building and design. Also, CTT will provide volunteer hours to match the PRT grant.
Katawba Valley Land Trust	Dr. Michelle Evans, Ex. Dir. 803-285-5801 mevans@kvlr.org	Coordinate redevelopment with adjacent/connected property and trail promotion post-cleanup.
Great Falls Hometown Association	Glinda Price Coleman, Ex. Dir. 803-385-7016 gassociation@truvista.net	Administering the PRT Grant for trail development and will coordinate volunteers (\$25,000 match). Promote the project within the neighborhood.
Great Falls Second Baptist Church	Chris Kennington 803-899-9561 [REDACTED]	Use of their parking lot for cleanup volunteers and use of dumpster for minor debris removal. Provided lunch and facilities to volunteers. Disseminate information throughout the faith-based community (located in the Mill Village by cleanup zones); promote participation by the public at project meetings.
Duke Energy	Tami Styer, Sr Project Manager 704-382-0293 Tami.styer@duke-energy.com	Coordinate redevelopment with adjacent/connected property (Republic Mill #1/ River Park) and trail promotion post-cleanup.
ARRAS Foundation	Cynthia Curtis, Community Investment Officer 803-286-8772 CCurtis@arrasfoundation.org	Provided \$63,000 for the Phase II ESA of the rail bed. Will work with Great Falls to promote trail recreational use and greenspace development.
First Baptist Church	Freddie Christopher, Deacon 803-379-0930 fecl@truvista.net	Have provided community meeting space. Disseminate information throughout the faith-based community (located adjacent to Republic Mill #1 near trail terminus); promote participation by the public at project meetings. Coordinate Church groups for litter pickup.
Great Falls Presbyterian Church	Mike Vaughn Clerk of Session [REDACTED]	Have provided meeting space and a BBQ for cleanup volunteers with the Hometown Association. Disseminate information throughout the faith-based community (located in eastern side of Great Falls near neighborhoods adjacent to rail/trail); promote participation and provide facilities for public meetings.

iii. Incorporating Community Input

Great Falls has been engaging the Target Area community in brownfields redevelopment and economic development planning activities for two decades. The prominence of these sites and the historical importance of the mills to many families in our small community means that interest and attention in these activities remain high. An ad was published in *The Great Falls Reporter* on Wednesday, November 10, 2021, to notify and invite the Target Area to review this grant application and the draft ABCA for the rail bed and attend a public meeting. The public meeting was held on Monday, November 15, 2021, at 6:30pm at Town Hall prior to a Town Council

Meeting, which is the usual time for public meetings in Great Falls, since we found it usually produces the most turnout. For this meeting, 27 people attended, and numerous questions were asked, as noted in the summary of the questions/responses attached to this application. The community expressed their excitement about this project and the efforts to create a future in eco-tourism for their town.

For this project, Great Falls will hold a series of community meetings at churches located in the Target Area adjacent to the former railroad or at Town Hall, a common location for our public meetings. The meetings will held at key project milestones: 1) project kickoff – at project start and after the ABCA is finalized to note whether any public comments were received and how those comments impacted the final ABCA and to explain the site cleanup activities, the process to reach site cleanup, and what the community can expect; 2) work preparation – prior to commencement of site work to alert the community before work starts of things to expect during the work, increased traffic, timing, noise, and precautions that will be taken to protect the community as well as to introduce the community to the cleanup contractor; and, 3) post-cleanup – after site work is completed to review the results and accomplishments. At all three meetings, the community will be provided the opportunity to ask questions and provide input on the plans presented. Sites for the meeting include Second Baptist Church (located in the key mill village, where cleanup activities will occur), First Baptist Church, Great Falls Presbyterian Church, and Town Hall prior to a Town Council Meeting. Information, including meeting times and locations, will be shared through our nonprofit partners, including the Great Falls Hometown Association, and via church bulletins, the local newspaper *Great Falls Reporter*, the Chester County paper, *The News and Reporter*, OnlineChester.com, and via social media accounts managed by Great Falls, Chester County, and our partners. A virtual alternative will be offered for those unable to attend in person and community members with disability and mobility limitations, if the COVID-19 pandemic persists and mitigation measures are necessary.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a. Proposed Cleanup Plan

Soil at the former railroad is contaminated with heightened levels of PAHs and metals, such as arsenic, aluminum, cobalt, iron, antimony and manganese. SCDHEC uses EPA’s Regional Screening Levels (RSLs) as cleanup standards; however, EPA does not have RSLs for recreational use, only residential and industrial with recreational lying in between. Since Great Falls intends to redevelop the former 3.5-mile railroad into a recreational walking trail, SCDHEC performed a risk evaluation and determined the exposure risk of using the rail bed for a trail. The results indicated engineering controls are needed to create a barrier between soils contaminated with PAHs/metals and the pedestrians using the walkway in the vicinity of the former mill village, which remains a residential neighborhood. This portion of the rail trail is approximately 1,100 linear feet between North Street and Center Street. Three other areas of the rail bed (see Figure 3 in the ABCA, approximately 90 feet total) have exceedances of residential RSLs and will require significant earth moving to prepare the trail; therefore, the Town plans to install the engineered cap in these areas as well to minimize exposure risks to future users, trail construction workers, and volunteers working on the trail. The draft ABCA evaluates three alternatives to address the areas of concern – no action, capping with decomposed granite, and capping with asphalt. The capping with decomposed granite option is recommended based on its effectiveness in preventing exposure, long-term reliability, implementability, and cost effectiveness. The ABCA recommends preparing the site for capping the identified areas, such as removal of surficial vegetation and debris/waste/trash from open dumping; grading the areas of concern; and installing an engineered cap of soil, coarse stone, and decomposed granite. In addition, the groundwater monitoring wells installed during the Phase II ESA will be abandoned as directed by SCDHEC during the remediation activities. Specifically, the cleanup plan includes the following:

- The **engineered cap** will be installed in the areas of concern and consist of a demarcation barrier at its base, 6” of clean fill, and 6” of aggregate base course (ABC_ stone, each compacted to 100% its standard proctor density, followed by a geotextile fabric, and 4” of decomposed granite screening. This weathered granite will include a non-toxic, colorless, and odorless stabilizer that produces a firm and durable walking surface.
- **Surficial waste**, including nonhazardous trash and household waste and vegetative brush, will be removed from the site in order to cap the areas and disposed at a permitted waste facility.
- **Three monitoring wells** used in previous sampling investigations will be abandoned in accordance with SCDHEC requirements.

b. Description of Tasks/Activities and Outputs

Task 1 – Project Management:
i. The Project Manager will be responsible for the overall execution and management of the project. He will track the project tasks, schedule, and budget; oversee the work of the Qualified Environmental Professional (QEP) and remediation subcontractors; and report on project activities and accomplishments to the stakeholders. The QEP will provide support with the reporting activities and will develop a Final Cleanup Report to document all project activities completed. The Town anticipates completing the project within two years.
ii. Schedule: Oct 1, 2022, to Sep 30, 2024; QEP hired prior to award; subcontractors by 3 rd Quarter
iii. Lead: Project Manager
iv. Outputs: 8 Quarterly Reports, 8 ACRES updates, 2 Disadvantaged Business Enterprise (DBE) reports, 2 Federal Financial Reports (FFRs), 1 Final Cleanup Report
Task 2 – Community Outreach:
i. The Town’s Project Manager will lead the Community Outreach activities. Great Falls will plan and conduct a series of community meetings, as described above (2.b.iii), at key milestones throughout the project. Additionally, the Town will establish an information repository at Town Hall and will communicate project information through Town Council meetings, local newspapers, church bulletins, social networking platforms, and other electronic means. A Community Involvement Plan (CIP) will be prepared to guide outreach efforts that will continue at planned intervals.
ii. Schedule: Oct 1, 2022, to Sep 30, 2024, with key public meetings in Jan 2023 (kickoff), Jul 2023 (prior to cleanup start), and Jan 2024 (post cleanup); CIP in 1 st Quarter
iii. Lead: Project Manager
iv. Outputs: CIP, 3 Public Meetings, Public Notices and Outreach Collateral
Task 3 – Cleanup Planning
i. Cleanup planning efforts will be led by the QEP. Activities will include finalizing the ABCA, preparing the final engineered design and specifications for the cap, negotiating and receiving any additional necessary regulatory approvals and permits, and preparing bid documents for the solicitation of cleanup contractors.
ii. Schedule: Jan 1, 2022 to Mar 31, 2022
iii. Lead: QEP
iv. Outputs: 1 Final ABCA, 1 Cap Design, 1 Set of Bid Documents
Task 4 – Site Cleanup
i. Great Falls will use the majority of the grant funds for the actual site cleanup activities. The Town will competitively procure a remediation subcontractor, who the Project Manager will oversee with the assistance of the QEP. The subcontractor will implement the cleanup plan. The QEP will work with SCDHEC to certify the cleanup is complete in accordance with the VCC requirements.
ii. Schedule: Subcontractor Procurement in 3 rd Quarter, Cleanup Activities beginning 4 th Quarter, Certificate of Completion by 6 th Quarter
iii. Lead: Project Manager with QEP Support
iv. Outputs: Cap Implemented, Surficial Waste Removed, 3 Monitoring Wells Abandoned, 1 Certificate of Completion

c. Cost Estimates

Task 1 – Project Management (PM): Great Falls requests \$5,000 in travel expenses to attend brownfields training and conferences (est. airfare \$550 + hotel \$400 + meals \$300 = \$1,250 X 2

staff X 2 trips = \$5,000). In addition, the Town’s QEP will coordinate the monthly team meetings and reporting responsibilities for \$21,300: 24 Monthly Team Meetings (24 X \$450 = \$10,800); 8 Quarterly Reports (8 X \$500 = \$4,000); 2 Annual Reports (2 X \$250 = \$500); 1 Final Summary Report (1 X \$5,000 = \$5,000); and, 8 Quarterly ACRES Updates (8 X \$125 = \$1,000). Town staff will expend approximately 8 hours per month in PM-related duties to meet the match requirement or as an in-kind donation (24 months X 8 hours X \$50/hour for labor and fringe = \$9,600).

Task 2 – Community Outreach: Great Falls will need \$11,500 for community outreach to include \$1,000 in supplies (newspaper advertisements, posters, site signage, mailings, and graphics) and \$10,500 for the QEP Contractor for the following tasks: Author the Community Involvement Plan (\$2,000); Plan and Facilitate Public Meetings (3 meetings X \$1,500 = \$4,500); and, Design Print and Electronic Outreach Materials (\$4,000). The Project Manager will spend 100 hours to support community outreach to meet the match requirement or as an in-kind donation (100 hours X \$50/hour = \$5,000).

Task 3 – Cleanup Planning: The QEP Contractor will lead cleanup planning activities at a cost of \$33,100 for the implementation of the following tasks: Incorporate public comments and finalize the ABCA (24 hours X \$125/hour = \$3,000); Design specifications for engineered cap (120 hours X \$145/hour = \$17,400); Create Bid Documents (RFP) for Site Cleanup, Evaluate Proposals, Validate References, Coordinate Pre-Bid Site Visit, and Select Subcontractor (60 hours X \$125/hour = \$7,500); and, Obtain necessary regulatory approvals and permits (40 hours X \$125/hour = \$5,000). The Project manager will provide 50 hours of support for cleanup planning to meet the match requirement or as an in-kind donation (50 hours X \$50/hour = \$2,500).

Task 4 – Site Cleanup: The cost for site cleanup activities is estimated at \$ 238,623 to include: Mobilization/Demobilization Fees (\$6,000); Construction Entrance (\$5,500); Stabilizing Eroded Areas (\$30,000); Clear-cutting 2.0 acres of New Growth Forest (\$10,000); Placement of clean fill (\$20,000); Placement of 450 tons of ABC Stone (\$6,750); Placement of 6,900 square feet of geotextile (\$2,000); Placement of 500 tons of Decomposed Granite (w/ Stabilizer) (\$47,680); Removal and Disposal of Onsite Debris (\$4,500); Abandonment of Onsite Monitoring Wells (\$4,500); Construction – anticipated at 40 days (\$2,000/day X 40 days = \$80,000); and, a contingency of 10% of costs (\$216,930 x 10% = \$21,693). The Project Manager will provide 50 hours of support for cleanup activities to meet the match requirement or as an in-kind donation (50 hours X \$50/hour = \$2,500).

These cost estimates were prepared based on similar work projects and with input from experienced environmental remediation contractors. Total EPA-funded project activities include \$309,523 plus \$19,600 of the Town’s personnel and fringe leveraged as in-kind, if Town’s request for a waiver for the required cost match is approved. If the cost share waiver is not approved, the Town will meet the cost share through the in-kind personnel/fringe labor totaling \$19,600 plus donations and cash totaling \$35,254, while the Total Federal Funding will equal \$274,269.

Budget Categories		Task 1 PM	Task 2 Outreach	Task 3 Planning	Task 4 Cleanup	Total
Personnel/Fringe		\$0	\$0	\$0	\$0	\$0
Travel		\$5,000	\$0	\$0	\$0	\$5,000
Supplies		\$0	\$1,000	\$0	\$0	\$1,000
Contractual		\$21,300	\$10,500	\$33,100	\$238,623	\$303,523
Total Federal Funding (with cost-share waiver)		\$26,300	\$11,500	\$33,100	\$238,623	\$309,523
Total Federal (with cost share)		\$26,300	\$11,500	\$33,100	\$203,369	\$274,269
Cost Share	In-Kind Personnel	\$9,600	\$5,000	\$2,500	\$2,500	\$54,854
	Cash Match				\$35,254	
Total (with cost share)		\$35,900	\$16,500	\$35,600	\$241,123	\$329,123

d. Measuring Environmental Results

Great Falls will track the project’s progress and take corrective actions, when necessary, through a monthly status meeting with the QEP, EPA Project Officer, and SCDHEC Project

Manager. The remediation subcontractor selected to perform the cleanup activities will be included in the monthly status meetings, when actual work is ongoing on the rail bed. Quarterly Reports will be submitted to the EPA and distributed to project partners that include information on project expenditures, activities, schedule, goals, and corrective actions (where applicable). Environmental results will be measured by the achievement of project milestones and performance metrics detailed in the project’s Work Plan (created at the start of the project). Key outcomes will include the amount of acres ready for reuse, degree of community participation, and redevelopment dollars leveraged by the project. Site-specific information will be regularly entered and tracked in the online ACRES database.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Programmatic Capability

i. Organizational Capacity, ii Organizational Structure, and iii. Description of Key Staff

The Town of Great Falls is led by a Town Council, consisting of a Mayor and six members, all of which are elected at-large. The Town Council oversees the Town operations, including 19 full-time and 5 part-time staff members. Glenn Smith, the Mayor Pro Tempore of Great Falls, will serve as the Brownfields Project Director and will be assisted by Julie Blackwell, the Town Clerk, Treasurer, and Clerk of Court. Mr. Smith has served on Town Council for the past 11 years and as Mayor Pro Tem for 9 years. He is a U. of S. Carolina (USC) graduate with a major in math who retired as the Director of Media Support Services at USC/Columbia and returned to his hometown upon retirement. Ms. Blackwell will support Mr. Smith in project activities. She has worked at the Town for 29 years, serving as Clerk/Treasurer for 20 years. She graduated from Great Falls High School and completed vocational school with certificates in bookkeeping and accounting.

iv. Acquiring Additional Resources

In order to complete the technical aspects of the project, the Town hire a QEP experienced in brownfields cleanup and redevelopment. The Town has issued a competitive Request for Qualifications (RFQ) through the *South Carolina Business Opportunities*, a live database for goods, services, information technology and construction needs of state and local governments. The procurement was completed in accordance with 2 CFR 200 and 1500, and Town selected the QEP after evaluating the submittals received. A contract will be negotiated with the QEP after notification of grant award. The Town will work with the QEP to competitively procure remediation subcontractors also in accordance with 2 CFR 200 and 1500. Systems are in place to replace key staff, if needed, and to procure additional consulting/contractor services, as needed.

b. Past Performance and Accomplishments

ii. Received Other Federal or Non-Federal Assistance Agreements.

(1) Purpose and Accomplishments: While Town has not been the recipient of an EPA Brownfield Grant, it has received funds from other organizations as noted.

Date	Awarding Agency	Amount	Remaining Funds	Accomplishments	Specific Outputs And Outcomes
2019	Arras Foundation	\$63,000	\$0	Due diligence, including a Phase II ESA, survey of rail bed to be acquired, closing costs for rail bed property.	Property purchased with appropriate due diligence completed and VCC in place with SCDHEC.
2021	SCPRT Trails	\$100,000	\$100,000	Building a trail on a rail bed	Work will begin once cleanup is completed.
2021	Carolina Thread Trail	\$100,000	\$0	Provided the majority of the funding for the purchase of the rail bed	Rail bed purchased from CSX on July 29, 2021

(2) Compliance with Grant Requirements: Great Falls met or is meeting all of the requirements and conditions of the grant funding described above, including constant and open communication with the granting agencies project managers, completing the projects according to the work plans and schedules, achieving and reporting the expected results, and submitting all required reports in a timely manner.

Threshold Criteria

Threshold Criteria

1. Applicant Eligibility:

The Town of Great Falls, South Carolina (Town) is a general-purpose unit of local government as defined under 2 CFR 200.64.

2. Previously Awarded Cleanup Grants:

The site has not received funding from a previously awarded EPA Brownfields Cleanup Grant.

3. Expenditure of Existing Multipurpose Grant Funds:

The Town affirms that it does not currently have an open EPA Brownfields Multipurpose Grant.

4. Site Ownership:

The Site, a 3.5-mile rail bed of a former rail line, was purchased from CSX Transportation, Inc. on July 29, 2021.

5. Basic Site Information:

- a. 3.5 miles of the former CSX Rail Bed
- b. There is no street address for this Site. The 3.5-mile bed of the former CSX rail line runs from a wooded area just north of the Town near Fishing Creek, through one of the mill villages along Seaboard Street and crossing Center Street, along the east of downtown in an undeveloped area adjacent to the Catawba River and the western bank of Great Falls Lake, and terminating just south of the former Republic Mill #1 property on the southeastern end of Great Falls near the intersection of Republic Street and Farrow Street. The majority of this trail, and all proposed cleanup activity, falls within the Great Falls Town limits (zip code 29055) and Census Tract Block Group 021000-2. Cleanup activities are focused on the mill village section of the trail and three other distinct areas of concern.
- c. The site is currently owned by the Town of Great Falls.

6. Status and History of Contamination at the Site:

- a. The Site is contaminated by hazardous substances. A Phase II Environmental Site Assessment (ESA) conducted in April 2021 identified elevated levels of heavy metals and polycyclic aromatic hydrocarbons (PAHs) in the soils at the four areas of concern along the rail bed (Site).
- b. An active rail line operated on the Site from at least the early 1900's to the mid 1980's transporting materials and goods to, between, and from the three Republic mills in Great Falls. Currently, the Site is a rail bed from which the rails and rail ties were removed in the mid to late 1980's.
- c. The soils at the Site are contaminated with metals - arsenic, aluminum, cobalt, iron, antimony, manganese, and vanadium as well as PAHs -benzo(a)anthracene,

Threshold Criteria

indeno(1,2,3-cd) pyrene, benzo(b)fluoranthene, dibenz(a,h)anthracene, and benzo(a)pyrene.

- d. It is likely that the Site became contaminated from use as an active railroad line for at least 80 years. A Phase I Environmental Site Assessment (ESA) Update was completed at the site in June of 2021 prior to property acquisition by the Town. This Phase I found that the documented soil contamination as determined by a Phase II ESA conducted in April of 2021 combined with the Site's long use as a railroad to be a Recognized Environmental Condition (REC). The Phase II ESA included the collection of surface and sub-surface composite soil samples (5 aliquots/sample) at 21 locations along the approximate 3.5 mile length of the rail bed as well as the installation of three groundwater monitoring wells and the sampling of those three and one monitoring previously installed at Republic Mill 1 which is adjacent to a portion of the rail bed. Metals and PAHs were detected at levels above EPA's Residential Regional Screening Levels with some contaminants above EPA's Industrial Regional Screening Levels at 16 of the 21 locations. No contaminants were detected in groundwater above applicable screening levels or standards.

7. Brownfields Site Definition:

- a. The Site is not listed or proposed for listing on the National Priorities List.
- b. The Site 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. The Site is not subject to the jurisdiction, custody, or control of the U.S. Government.

8. Environmental Assessment Required for Cleanup Grant Applications:

A Phase II ESA was completed at the site in April of 2021. An AAI compliant Phase I ESA was completed in June of 2021, prior to site acquisition by the Town.

9. Enforcement or Other Actions:

The Town is not aware of any ongoing or anticipated environmental enforcement or other actions related to the Site. The Town is not aware of any inquiries or orders from federal, state, or local government entities on the subject property.

10. Sites Requiring a Property-Specific Determination:

The Site does not require a property-specific determination.

11. Threshold Criteria Related to CERCLA/Petroleum Liability:

- (a) Property Ownership Eligibility – Hazardous Substances Sites
 - iii. LANDOWNER LIABILITY PROTECTIONS FROM CERCLA §107 Liability
 - (1) Bona Fide Prospective Purchaser Liability Protection

Threshold Criteria

The Town is NOT potentially liable for contamination at the site under CERCLA §107.

- a. Information on the Property Acquisition
 - i) The Town purchased the property from the previous property owner, CSX Transportation, Inc.
 - ii) July 29, 2021
 - iii) The Town holds fee simple title to the property. No other entities own the property.
 - iv) The Site was acquired from CSX Transportation, Inc.
 - v) There are no known familial or corporate relationships or affiliations with the any of the previous owners: CSX Transportation, Inc; Seaboard System; Seaboard Coastline Railroad; Seaboard Airline Railroad; Catawba Valley Railway; and/or Southern Power Company.
- b. Pre-Purchase Inquiry
 - i) An AAI compliant (ASTM 1527-13) Phase I ESA Update was completed with a report dated June 25, 2021. This assessment was performed for the Town of Great Falls as part of its environmental due diligence on the Site using funds from the Catawba Regional Council of Government's Brownfield Assessment Program (Coalition Grant #BF-00D73118). A Phase II ESA (ASTM E 1903-19) was completed with a report dated April 29, 2021. This assessment was performed for the Town and paid for by the Town (ARRAS Grant awarded to the Town). An AAI compliant (ASTM 1527-13) Phase I ESA was completed with a report dated November 13, 2020. It was completed for the Town of Great Falls, the Catawba Regional Council of Governments and Chester County. It was paid for by the Catawba Regional Council of Government's Brownfields Assessment Grant (Coalition Grant #BF-00D73118).
 - ii) The AAI compliant (ASTM 1527-13) Phase I ESA and the Phase I ESA Update were completed by Cardno, Inc. for use by the Town prior to property ownership transfer. Cardno staff were/are fully qualified to complete the Phase I ESA and met/meet the definition of the Environmental Professional (E.P.) as defined by the standard.
 - iii) The Phase I ESA was completed on November 13, 2020; a Phase I ESA Update was completed on June 25, 2021, and the Site was acquired by the Town on July 29, 2021.
- c. Timing and/or Contribution Toward Hazardous Substances Disposal

The site, a rail bed without rails or rail ties, was formerly an active railroad line from at least the early 1900's until the mid 1980's. All contamination occurred prior to the Town's acquisition of the property on July 29, 2021. The Town has not caused or

Threshold Criteria

contributed to any release of hazardous substances at the Site. The Town has not, at any time, arranged for the disposal of hazardous substances at the Site or transported hazardous substances to the Site.

d. Post-Acquisition Uses

The Site has remained vacant since the Town acquired it. There have been no users of the Site since the Town acquired it.

e. Continuing Obligations

i) No continuing releases of hazardous substances have been discovered or are known at the Site. If a release occurs, the Town will take every reasonable step to stop the release.

ii) The Town is not aware of any threat of a release. If a threat of a release becomes known, the Town will take all reasonable steps to prevent such release and any future releases.

iii) It is not feasible for the Town to physically restrict access to a 3.5 mile rail bed; thus, in order to prevent and/or limit exposure to remaining potential contaminants, the Town has entered into a Voluntary Cleanup Contract (VCC) with the South Carolina Department of Health and Environmental Control (SCDHEC), VCC 20-7552-NRP and is complying with the terms on the VCC. It has posted two signs at the most visible portions of the Site with information about the need for cleanup as well as contact information for the Town and SCDHEC. The VCC's sign language and location is approved by SCDHEC. Also, as required by the VCC and in order to apply for this grant, the Town contracted for an Analysis of Brownfields Cleanup Alternatives (ABCA) to be prepared. This draft ABCA was placed on public notice on November 16, 2021, along with the draft EPA Brownfields Grant Application. Both of these documents include sections on the contamination at the rail bed and the need for cleanup. A well-attended public meeting was held on November 15, 2021. A presentation was made that explained the results of the Phase II ESA. Further, copies of the ABCA the draft EPA Brownfields Cleanup Application were provided at the meeting as well as left at Town Hall for the public.

The Town confirms its commitment to the following:

- i) Comply with all 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; and
- iv) Provide all legally required notices.

Threshold Criteria

- (b) Property Ownership Eligibility – Petroleum Sites
This Site is not a petroleum site, and the Town is not requesting petroleum funding.

12. Cleanup Authority and Oversight Structure

- a. The Town of Great Falls, a non-responsible party, entered into the SCDHEC Brownfields Program by applying for a Voluntary Cleanup Contract (VCC) and signing VCC 20-7552-NRP on January 19, 2021. This VCC was public noticed by SCDHEC in the Town’s local newspaper for thirty days. SCDHEC signed the VCC, and it became effective on April 12, 2021. The Town acquired the Site on July 29, 2021. Under the VCC, SCDHEC will provide oversight of the cleanup of the rail bed. Upon completion of the cleanup to the satisfaction of SCDHEC, the Town will receive a Certificate of Completion.

The Town will seek the technical expertise of a brownfield/environmental consultant to manage, oversee, and complete the cleanup activities at the site property. We have procured a qualified consultant with brownfields experience through a competitive process in accordance with the competitive procurement provisions of 2 CFR 200, EPA’s rule at 2 CFR 1500, and our own procurement requirements.

- b. The Phase II ESA did not give any indication that contamination has migrated from the rail bed, so it is unlikely that impact has occurred on adjacent properties. Further, the cleanup is likely to be the capping of certain portions of the rail bed. We do not anticipate the need for access to adjacent properties to conduct the cleanup; we do not anticipate the need to perform confirmation sampling; no contaminated soils are expected to be removed from the Site. Care will be taken to ensure that there is no offsite migration of contamination. The Town of Great Falls is a small town (less than 2,000), and Town officials and Council members know most everyone in the Town. Further, one of our community partners is the Second Baptist Church which is located in the mill village near the rail bed. Also, Duke Energy, a community partner, has agreed to coordinate redevelopment with adjacent/connected properties. So, if off-property access is necessary for any of the proposed remedial activities, the Town expects no problems obtaining access to adjacent properties.

13. Community Notification

- a. Draft Analysis of Brownfield Cleanup Alternatives
A copy of the Draft ABCA is attached. Cleanup alternatives and a recommended solution were presented in the public meeting held on November 15, 2021.
- b. Community Notification Ad
The Town placed a Legal Notice in *The News and Reporter*, a general circulation in Chester County, SC on November 10, 2021, to provide the community with notice of its intent to apply for cleanup grant funding. A copy of the notice is

Threshold Criteria

attached.

c. Public Meeting

A public input meeting was held at Town Hall to discuss the brownfield cleanup grant application and ABCA. This meeting was held at the time and location that most public meetings are held in Great Falls – just prior to the Town Council Meeting at Town Hall. The findings of the ABCA were presented and community members were able to ask questions regarding the ABCA, the cleanup project at the site, and the grant application. There was good discussion and questions at the meeting, but there were no comments that would necessitate a change in the ABCA and/or grant application. Further, no comments were received on the ABCA or grant application through November 29, 2021. The public notice period for the ABCA will continue until December 16, 2021. If comments are received warranting a modification of the ABCA, it will be done as a part of finalization of the ABCA as a part of the pre-cleanup work. A copy of the sign-in sheet and meeting minutes and feedback is attached.

d. Submission of Community Notification Documents

The following are attached:

- Copy of the Draft ABCA, Cardno, Inc., November 12, 2021
- Copy of the Legal Notice in the *The News and Reporter*, a general circulation in Chester County, SC, from November 10, 2021
- Several questions were asked during the meeting, and they are included in the meeting notes, but no specific comments or questions that would prompt a change in the ABCA or grant application were provided during the meeting or through November 29, 2021.
- Meeting notes from the November 15, 2021, community input session.
- A copy of the public meeting sign-in sheet

14. Statutory Cost Share

The Town is requesting a Hardship Waiver. The Hardship Waiver Request is attached.

15. Waiver of the \$500,000 Limit

The Town is not requesting a waiver to increase the request above \$500,000. In fact the request is less than \$500,000.

16. Named Contractors and Subrecipients

N/A. The Town did not name a contractor or subrecipient in the narrative portion of this grant application.