

City of Ideal

Samuel Jenkins
Mayor

Betty Rainey
City Clerk

P.O. Box 9
Ideal, Georgia 31041
Phone (478) 949-2720
Fax (478) 949-2723

City Council
Nathaniel Rogers
Kay Hardage
Jimmy Ogburn
Gwen Nelson
Melissa Joiner

1. Applicant Identification
City of Ideal, Georgia
605 Tom Watson Avenue
Ideal, Georgia 31041
2. Website URL: <https://www.maconcountyga.gov/ideal-georgia.cfm>
3. Funding Requested
 - a. Grant Type: Single Site Cleanup
 - b. Federal Funds Requested: \$433,080
4. Location
 - a) City of Ideal, b) Macon County, c) Georgia
5. Property Information
Former Ideal School
106 Martin Luther King Drive
Ideal, Georgia 31041
6. Contacts
 - a. Project Director
Tracie Hadaway, Planning and Government Services Director
River Valley Regional Commission
706-256-2910
Thadaway@rivervalleyrc.org
710 Front Avenue, Suite A, Columbus, GA 31901
 - b. Chief Executive/Highest Ranking Elected Official
Samuel Jenkins, Mayor
478-949-2720
Cityofideal@windstream.net
605 Tom Watson Avenue, Ideal, Georgia 31041
7. Population
City of Ideal, GA: 625
(US Census: 2018–2022 American Community Survey)

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8. Other Factors

| Other Factors | Page # |
|--|---------------|
| Community population is 15,000 or less. | 1, 3 |
| The applicant is, or will assist, a federally recognized Indian Tribe or United States Territory. | N/A |
| The proposed brownfield site(s) is impacted by mine-scarred land. | N/A |
| Secured firm leveraging commitment ties directly to the project and will facilitate completion of the remediation/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation. | N/A |
| The proposed site(s) is adjacent to a body of water (i.e., the border of the proposed site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them). | N/A |
| The proposed site(s) is in a federally designated flood plain. | N/A |
| The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy. | N/A |
| The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures. | 2-3 |
| The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments. | 2-3 |
| The target area(s) is impacted by a coal-fired power plant that has recently closed (2014 or later) or is closing. | N/A |

9. Releasing Copies of Applications

Not Applicable.

City of Ideal, GA
FY25 Brownfield Cleanup Grant
Narrative

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

a. Target Area and Brownfields i. Overview of Brownfield Challenges and Description of Target Area: The City of Ideal (City), a 1.2-square-mile city located in western Macon County, Georgia, was incorporated on January 1, 1907.¹ Census data suggests that, like much of Macon County (County), the City has not experienced growth over the last century; its current population stands at approximately 625 people.² Historically, commerce in the County was driven by agriculture, with an emphasis on peaches and cultivated cotton.³ Much of the historic agricultural success of the County relied on slave labor and sharecropping, which led to the creation of sensitive minority populations throughout the county. Coupled with the decline of small farming operations throughout the region, the County's lack of access to resources like social services and higher education has contributed to economic stagnation in Ideal. The City's isolated and rural nature has diminished its citizens' ability to prosper. The lack of resources and community investment opportunities within the City can be attributed to its lack of a major roadway, the removal of the railroad station, and a declining agriculturally centered economy. The population of Ideal has a lower-than-average median household income (\$21,800) and a higher-than-average population at or below the poverty line (54%).² The **geographic boundary and target area** for this grant is the **city limits**. The City is identified as a **Climate Economic Justice Screening Tool (CEJST) Justice40 disadvantaged community**. A lack of investment in the target-area community has resulted in the abandonment of previously used structures, leading to increased blight and deterioration of local neighborhoods. This Cleanup Grant will allow the community an opportunity to reduce blight, create local jobs, and enjoy a communal space.

ii. Description of the Proposed Brownfield Site(s): The **former Ideal School site** is located at 106 Martin Luther King Drive and comprises one tax parcel totaling approximately 18.7 acres. The site contains a dilapidated building that was historically used as an elementary school, closed in the early 1980s. The building, which was constructed sometime around 1970, is still in its original configuration and totals approximately 30,000 square feet. According to the County's tax assessor records, the site has been owned by the City since 1981.⁴ The school building is in an advanced state of deterioration, with a collapsed roof in the cafeteria and shattered windows throughout. Wall-mounted air conditioning units have been removed from the building, leaving large openings left uncovered. A large portion of an exterior wall of the structure was removed by vandals to access a steel beam that once gave partial support to the roof. The former school building, which is unfenced, sits within approximately 200 feet of occupied residences. Immediately north of the school building is the Ideal City Park, the only public park in the city limits, which boasts a small selection of playground equipment, a basketball court, and a covered pavilion. The park was built by the City in 2010 and occupies the northern area of the tax parcel. The former Ideal School building is just south of the park, and the larger southern portion of the parcel is vacant, wooded land.

A Phase I Environmental Site Assessment (ESA), dated April 5, 2022, was conducted on the property as part of the River Valley Regional Commission's (RVRC) Brownfield Coalition Cooperative Agreement. A review of environmental database listings indicated that a portion of the site was also previously used as an inert landfill in the 1990s; the use of the property as an inert landfill was determined to be a Recognized Environmental Condition (REC). Additionally, the

¹ Macon County, GA website: [Ideal Georgia - Macon County, GA.](#)

² US Census 2018–2022 American Community Survey.

³ Luckett, Robert. "Macon County." *New Georgia Encyclopedia*, 28 July 2006, <https://www.georgiaencyclopedia.org/articles/counties-cities-neighborhoods/macon-county/>.

⁴ Macon County Tax Assessor: [qPublic.net - Macon County, GA - Report: 204AB 0014.](#)

assessment also identified suspected asbestos-containing materials (ACMs), suspected lead-based paint (LBP) materials, and universal waste due to the age of the structure. After approval of the Site-Specific Quality Assurance Project Plan (QAPP), dated May 31, 2023, a Geophysical Site Assessment and a Hazardous Material Inspection were conducted at the site. No evidence of the inert landfill was identified on the subject property during the assessment; therefore, no further action was recommended to address the REC. The Hazardous Materials Inspection revealed that although LBP materials were not detected at the site, ACMs were identified throughout the existing structure. The presence of ACMs and the unsafe conditions of the existing structure pose an immediate health risk to the nearby residents and patrons of the Ideal City Park.

b. Revitalization of the Target Area i. Reuse Strategy and Alignment with Revitalization Plans: The County and the cities of Ideal, Marshallville, Montezuma, and Oglethorpe, Georgia, initiated an update to their four-year **Greater Macon County Comprehensive Plan (Plan)** in the Fall of 2021. They began the process with separate public meetings, each held by one of the five jurisdictions, with the goal of increasing public participation through increased convenience. Hearings were held in person, virtually, or as a combination of in-person and virtual options. This planning focused on community goals, community needs and opportunities, the Community Work Program, broadband services, economic development, and **community land use** through character area mapping or future land use mapping. A work session and a publicly advertised input session were held within the City. The public input session was advertised to the City's underserved population via local printed newspaper, local digital newspaper, and posts on local government websites and social media pages. Additionally, a survey was produced, and links were circulated to community members via public and private websites and the community's digital newspaper.

The City identified neighborhood revitalization as a goal for the School Drive Character Area of the city, which is the character area within which the **former Ideal School** is located. The City's goal for completing assessments, remediation, demolition, and redevelopment on the cleanup site includes the proposed redevelopment as a community center by way of using brownfield assistance for hazardous materials abatement along with partial demolition necessary for abatement activities to occur. The City has support from the local community to **redevelop the site into a multipurpose community center with an incorporated greenspace for resident recreation**. The City is currently working with community members and the RVRC, a regional nonprofit organization, for visioning and redevelopment planning. The goal of the cleanup is to provide the citizens of Ideal with a much-needed public space for a variety of community events, **directly aligning with the Plan's community land use goals**.

ii. Outcomes and Benefits of Reuse Strategy: The target area is overwhelmed with blighted and vacant sites that are prime for reinvestment. Redeveloping the former Ideal School as a multipurpose community center will provide both economic and noneconomic benefits to the City's **disadvantaged community**. Economic benefits will develop through jobs created by construction and implementation of the new center. The new community center will also generate economic opportunities for the City through the implementation of **facility rentals, various program fees, sponsorship opportunities, and tax-related revenue opportunities**. Noneconomic benefits spurred by a new community center include the development of much-needed **social support services** for the target area's sensitive population. The new center will generate a **higher quality of life** for target-area residents through **increased access to local resources and educational opportunities, and new greenspace to gather in**. Additional noneconomic benefits include the removal of blight on unused properties and using the land to generate a stronger sense of community belonging.

The City will work with developers to create and implement a building plan that improves the area's **climate adaptation/mitigation capacity and resilience**. Plans will include the implementation of **energy-efficient building materials and fixtures**. The new construction will be more resilient to the increasing frequency and intensity of natural disasters; one purpose of the community center will be to provide its sensitive residents with a much-needed emergency storm shelter. **Areas of outdoor shade and native landscaping will be incorporated into the City's redevelopment plans.**

c. Strategy for Leveraging Resources i. Resources Needed for Site Characterization: The previous investigations conducted at the site sufficiently characterized the overall extent and degree of contamination to develop a draft Analysis of Brownfields Cleanup Alternatives (ABCA) with a preferred cleanup approach. At this time, no additional resources are believed to be needed for site characterization. In the case the site needs additional assessment for characterization, alternative funding will be sought from such entities as the United States Department of Agriculture (USDA), the Georgia Department of Community Affairs (DCA), Georgia Environmental Protection Division (GAEPD), or other local, state, or federal sources.

ii. Resources Needed for Site Remediation: The EPA grant funding requested in this application will be sufficient to allow the City to complete the remediation. In the case additional funding is needed to complete necessary remediation at the site, alternative funding will be sought from such entities as the USDA, the Georgia DCA, GAEPD, or other local, state, or federal sources.

iii. Resources Needed for Site Reuse: The City will seek funding from local, state, and federal resources to achieve its goal of redevelopment. US Department of Housing and Urban Development Community Development Block grants will be pursued for removal of blight through demolition upon completion of clean up, infrastructure improvements, and development of a community center.

iv. Use of Existing Infrastructure: The cleanup site is serviced by Martin Luther King Jr. Drive, located to the north of the property; water and sewer infrastructure owned by the City are available along Martin Luther King Jr. Drive. There are currently no utilities in service at the cleanup site; however, utility connections are already established. An infrastructure evaluation has been included in this grant application plan to determine the condition and capacity of existing utilities. Funding will be secured from HUD Community Development Block Grant (CDBG) funds should improvements to existing infrastructure be recommended.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

a. Community Need i. The Community's Need for Funding: The target area (city limits) is not only a **CEJST Justice40 disadvantaged community**, but it is also identified by the Georgia DCA as a **Tier 1 Community**. Tier 1 Communities are defined as having **high unemployment rates, low per capita income, and a high percentage of residents whose incomes are below the poverty level** in the state of Georgia. The City suffers from extremely low-income levels and has a **tiny population of 625 residents**.⁵ The **average income of Ideal's residents is only approximately one quarter of the national average**, painting a dismal picture for this underserved community. The City has a **per capita income of \$10,839, a median household income of \$21,800, and a median family income of \$23,375**, well below the national averages (\$41,261; \$75,149; \$92,646).⁵ To add to the daily stress of these underserved residents, the target areas are in the **96th percentile for low income**.⁶

⁵ US Census 2018–2022 American Community Survey.

⁶ EJ Screening Tool.

The City has no ability to raise additional tax revenue due to the extreme poverty of this small, disadvantaged community. With the City budget allocated for salaries and basic city services such as police and fire, the City lacks the funding for assessment and cleanup that would allow for redevelopment. With no additional funding for new projects, these impoverished residents will continue to endure the negative health effects and blight currently limiting the growth of the City. Assistance from the EPA Brownfield Cleanup Grant funding will give the City the ability to provide resources, cleanup hazards, and generate revitalization to provide a brighter future full of opportunities with the hope of a better tomorrow for generations to come.

ii. Threats to Sensitive Populations: (1) Health or Welfare of Sensitive Populations: Sensitive populations within the City include **minorities, the youth and elderly, females, and the impoverished.** The City has a significantly high **Black population of 85%**, nearly seven times the national average (13%).⁷ In addition, the target area has a high population of youth and elderly residents at 62% (US 42%).⁷ **Females comprise 70% of the population** in Ideal (US 50%), and of those **66% are female head of households (FHOH) with no spouse present living below the poverty level** (US 24%), and **79% are FHOH with no spouse present with children under the age of 18 living in poverty** (US 33%).⁷ The extremes of this impoverished community are shown by **43% of all families in the City having incomes below the poverty line** which is *six times* the national average (US 9%) and **74% of families with children under 18 living below the poverty level** (US 14%).⁷ Add in the fact that **43% of these residents depend on government food assistance** (US 12%), and it is easy to see why this disadvantaged target area is in dire need of redevelopment that will foster a better future for this underserved community.⁷

This CEJST designated disadvantaged community suffers from numerous welfare issues. Target-area residents struggle to successfully obtain a high school education; indeed, the EJ Screen shows that **36% of residents lack a basic high school education.** A **lack of access to broadband internet also sits in the 93rd percentile for the state.**⁸ An inability to access basic resources attributes to the underserved community's **94th percentile for unemployment.**⁹ Adding in **extremely high heart disease and diabetes rates (98th percentile for both),** and the concern for the future of these residents continues to rise.⁸ Access to reliable transportation is also questionable as the target area ranks in the **96th percentile for transportation barriers.**⁹ The development of the former Ideal School site into a new, multipurpose community center with redesigned greenspace will provide this sensitive population of impoverished people access to a vital resource for the establishment and promotion of community outreach programs, educational advancement programs, and free wi-fi. The center will also improve overall health with recreational/healthy living opportunities that will finally give a sense of hope to this **disadvantaged community.**

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions: The confirmed contaminants at the former Ideal School can lead to serious health concerns for residents. Sensitive populations can face more significant risks of disease and health conditions such as cancer and asthma because of conditions at brownfield sites. Exposure to asbestos can be detrimental to children and young adults, who are particularly drawn to the unsecured, vacant, and unattended former Ideal School. ACM creates an ongoing air-quality and health threat to this community as the former Ideal School continues to deteriorate. The target area ranks in the **89th percentile for asthma.**⁸ **The target area also has an extremely high 90th percentile cancer ranking** per the EJ Screening Tool. According to the West Central Health District 2022 Community Health

⁷ US Census 2018–2022 American Community Survey.

⁸ EJ Screening Tool.

⁹ CEJST.

Assessment for the County (city level data not available), the leading cause of premature death in the County was cancer, with 1,875 deaths/100,000 (Georgia 1,351/100,000).

The greater than normal disease and health risks continue to mount with the **low life expectancy ranking in the 81st percentile**.¹⁰ Without EPA Brownfield Cleanup Grant funding, the City will be unable to fund the remediation of this site. When the City is able to address the environmental concerns, the revitalization process and real-life benefits of creating a new community center, revitalized greenspace, and increasing walkability within the community will create generations of a healthier sensitive population.

(3) Environmental Justice (a) Identification of Environmental Justice Issues: The target area and cleanup site are in a designated **CEJST Justice40 disadvantaged community**. The City fits the starkest definition of an underserved and disadvantaged community with high rates of poverty and extremely low-income levels. The City's isolated and rural nature has diminished its citizens' ability to prosper. The lack of resources and community investment opportunities within the City can be attributed to its lack of a major roadway, the removal of the railroad station, and a declining agriculturally centered economy. This extremely impoverished community suffers from the hardships created by the **ongoing environmental concerns, blight, abandoned buildings such as the Ideal School cleanup site, and vacant lots**. All these negative disproportionate environmental stressor burdens continue to add to the cumulative impacts of inequalities in this community's environmental health. EPA EJ Screen Report shows the target area's environmental and socioeconomic burdens and critical service gaps in percentiles are as follows: **76th wastewater discharge, 69th for lead paint, 97th for low income, 96th for less than a high school education, 93rd for lack of broadband internet, 87th for lack of health insurance, and added transportation burden**. Sensitive and underserved populations such as those who are impoverished, Black, young, elderly, or undereducated are not experiencing the same economic prosperity and growth as other communities within the state. With Brownfield Cleanup funding, the years of environmental justice (EJ) hardships will change for this distressed community. The new multipurpose community center redevelopment will help the disadvantaged and impoverished residents of the target area overcome the area's historic socioeconomic hurdles.

(b) Advancing Environmental Justice: EPA Brownfield funding will address EJ issues that continue to plague this disadvantaged community by reducing the EJ burden, lessening the number of abandoned and blighted sites with the cleanup of the former Ideal School, allowing for educational advancement, and creating a healthier community. Redevelopment will prepare a prosperous future for this community through a new multipurpose community center and revitalized greenspace that will enhance the quality of life for these underserved residents who have suffered for generations. The proposed reuse of the former Ideal School will improve the health and wellbeing of the sensitive populations and remedy the many inequalities such as access to improved educational and training opportunities, community programs and services, a recreational/healthy living space, free wi-fi, and a new community gathering space. **The planned cleanup of the vacant former Ideal School will not cause any displacement of residents or businesses**. The City will employ redevelopment strategies that will prevent or minimize the potential of any future displacement by helping direct investors to use vacant locations throughout their city.

¹⁰ EPA EJ Screen Report.

b. Community Engagement i. Project Involvement & ii. Project Roles

| Name of organization | Entity’s mission | Point of contact | Specific involvement in the project or assistance provided |
|--|---|---|--|
| River Valley Regional Commission (RVRC) | The mission of the RVRC is to create, promote, and foster orderly growth and economic prosperity for our region. | Laura Schneider lschneider@rivervalleyrc.com | Assist in project management; provide facilities for various programmatic meetings and training. |
| Development Authority of Macon County (DAMC) | The role of the DAMC is to promote, develop, and advance economic growth in Macon County and its municipalities. | Gerald Beckum [REDACTED] | Assist in the planning aspects of the building design; provide facility to showcase economic opportunities within Ideal. |
| Legacy Development Group | Dedicated to social, economic, educational, and personal development in our communities (serve Macon, Peach and Pulaski Counties) | Angela Williams [REDACTED] 478-335-8237 | Use of the planned community center for food distribution to local residents in need |
| Macon County Health Department | Strive to help individuals make informed decisions about their health and well-being by providing education and prevention services | Tracey Adamson, Nurse Manager 833-337-1749 | Use of the planned community center for education and prevention services. |
| Macon County Family Connection (MCFC) | MCFC’s mission is early literacy in Macon County. | Nicole Howell Nhowell@macon.k12.ga.us | Use the community center to provide literacy, health, and wellness programs. |

iii. Incorporating Community Input: The City recognizes the importance of including community residents and stakeholders throughout project planning and implementation, especially those underserved residents most affected by the cleanup project. A Community Involvement Plan (CIP) will be created to outline the planned community engagement activities, schedule, project background, and key players. The CIP will be available for review at the City’s office and on the City’s website and will ensure engagement with the target areas’ underserved community. To educate target-area residents on the Brownfield Cleanup Program, the City will perform community outreach quarterly meetings. The **Brownfield Project Team** will review and evaluate comments and community input during quarterly meetings, recording all community member suggestions and information in the minutes and posting them on the City’s Brownfield Program website. All suggestions and input will be addressed on an individual basis within two weeks and promptly posted to the City’s Brownfield Program website for further public review. The CIP will incorporate several forms of media. Brownfields updates will be posted to the Brownfield Program webpage. The City will provide resident interaction via the website and social media as a supplement to in-person community engagement. The City will disseminate Brownfield Project information through signage in government buildings, press releases, and local newspapers and will update organizations and community members at community education meetings held throughout the target area. All promotional materials will be available, and the names and contact

information of the City’s Brownfield Program Team will be posted on the City’s brownfield webpage, facilitating community-member contact with Brownfield Project Team.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a. Proposed Cleanup Plan: The recommended cleanup approach is hazardous materials removal and placement in a permitted landfill. As part of hazardous materials removal, partial demolition will be necessary to complete the asbestos abatement and ensure the safety of the contractors. The remainder of the demolition will be completed following completion of the hazardous materials removal utilizing funds secured elsewhere. This alternative would address exposure risks using a proven approach consistent with recognized industry and regulatory standards (e.g., Georgia Regulations, NESHAP, OSHA). This option would remain comparably cost-effective under almost all abatement scenarios and building conditions. Asbestos and regulated universal waste removal would not require the need for subsequent inspections, maintenance and/or regulatory oversight. This alternative addresses hazardous materials liabilities, potential contaminant sources or potential limitations to future land use and brownfields redevelopment potential consistent with the City’s goals and re-use planning.

b. Description of Tasks/Activities and Outputs:

| | |
|-----------------------------------|---|
| Task 1: Outreach | |
| i. | <i>Project Implementation:</i> CIP, outreach materials, Brownfield (BF) Project webpage, and social media posts developed by City’s BF Project Director with assistance of the qualified environmental professional (QEP). City staff will lead the community/educational meetings discussing project plans and updates. Supplies: printing of outreach materials (brochures/handouts) and office supplies to manage the grant. |
| ii. | <i>Anticipated Project Schedule:</i> CIP created in Q1. Community/educational meetings held Q1 Y1–4. Webpage and outreach materials created in Q1 and posted throughout the grant. |
| iii. | <i>Task/Activity Lead:</i> City: Tracie Hadaway, RVRC Director of Planning and Government Services, BF Project Director |
| iv. | <i>Outputs:</i> CIP, BF Webpage, 4 community/educational meetings, brochures/handouts, social media posts, summary of community meetings in EPA-required quarterly reports |
| Task 2: Program Management | |
| i. | <i>Project Implementation:</i> The City will procure a QEP to assist with the BF Grant Project. The City’s BF Project Manager will oversee grant implementation and administration to ensure compliance with the EPA Cooperative Agreement work plan, schedule, and terms and conditions. The QEP will assist in completing ACRES database reporting, yearly financial reporting, quarterly reporting, MBE/WBE forms, and additional programmatic support for the four-year term of the grant. The City’s travel budget allows for two staff to attend two BF training conferences/workshops. |
| ii. | <i>Anticipated Project Schedule:</i> Procure QEP in Q1. ACRES and quarterly reporting begins in Q1 and continues throughout the grant. Annual Reporting and forms created in Q5, 9, 13, and final closeout. |
| iii. | <i>Task/Activity Lead:</i> City: Ms. Laura Schneider, RVRC Regional Planner, BF Project Manager |
| iv. | <i>Outputs:</i> ACRES database reporting, 4 annual financial reports, 16 quarterly reports, 4 MBE/WBE forms, programmatic support for the four-year grant period. Two staff to attend 2 conferences. |
| Task 3: Cleanup Planning | |

| | |
|------|---|
| i. | <i>Project Implementation:</i> The City’s BF Manager will oversee the QEP as they finalize the ABCA and Abatement Designs, prepare QAPPs and Health and Safety Plans (HASPs). |
| ii. | <i>Anticipated Project Schedule:</i> The finalized ABCA, abatement designs, QAPP and HASP documents will be created within six months of award. The visioning sessions will be held in Q3 of years 2 and 3 of the grant cycle. The site reuse vision/design plan will be generated in Q4 of year 3 after community input is received. The infrastructure evaluation will be performed after the abatement of the hazardous material from the structure at the site. Two cleanup reports will be generated following the cleanup activities. |
| iii. | <i>Task/Activity Lead:</i> The QEP will be tasked with the technical aspects of the project with oversight from City: Ms. Laura Schneider, RVRC Regional Planner, BF Project Manager. |
| iv. | <i>Outputs:</i> 1 ABCA, 1 Abatement Design, 1 Site Specific-QAPP & HASP, 1 Site Reuse Vision, 1 Infrastructure Evaluation. |

Task 4: Cleanup

| | |
|------|--|
| i. | <i>Project Implementation:</i> The City’s BF Project Manager, with assistance from the QEP, will oversee the abatement contractor as they perform site cleanup activities including contractor coordination, mobilization, abatement of ACM and other regulated waste from the site. |
| ii. | <i>Anticipated Project Schedule:</i> Cleanup and abatement activities will begin within 9–12 months of award and will be completed within 3 months after initial activities. |
| iii. | <i>Task/Activity Lead:</i> The QEP will be tasked with the technical aspects of the project with oversight from City: Ms. Laura Schneider, RVRC Regional Planner, BF Project Manager |
| iv. | <i>Outputs:</i> 1 site ready for reuse, 4 remediation job created (annualized), 2 cleanup reports |

Task 5: Cleanup Oversight

| | |
|------|---|
| i. | <i>Project Implementation:</i> The City’s BF Project Director will manage the QEP as they provide oversight of proposed site cleanup activities, perform asbestos air monitoring, regulated waste removal, clearance sample analysis, and cleanup reporting throughout the grant cycle. |
| ii. | <i>Anticipated Project Schedule:</i> Oversight of cleanup and abatement activities will begin within 9–12 months of award and will be completed within 3 months after initial activities. Cleanup reports will be delivered within 60 days of completion of abatement activities. |
| iii. | <i>Task/Activity Lead:</i> The QEP will be tasked with the technical aspects of the project with oversight from City: Ms. Laura Schneider, RVRC Regional Planner, BF Project Manager. |
| iv. | <i>Outputs:</i> 2 Cleanup Reports |

c. Cost Estimates: Below are the anticipated cost estimates for this project *based on past brownfield projects as determined by local market standards with contractual hourly rates based on the skills needed for the specific tasks.*

- The budget for this project includes travel, supplies and contractual costs only.
- Personnel pay rates average \$50 per hour including fringe.

Task 1 Outreach: Personnel (\$50/hr): CIP \$500 (10 hrs); BF webpage, outreach brochure/handouts, social media posts \$2,000 (40 hrs); 4 community/educational meetings \$4,000 (\$1,000 per mtg; 20 hours per meeting to include preparation and execution). Contractual: CIP \$3,500 (20 hrs x \$175); BF webpage, outreach brochure/handouts, social media posts \$2,100 (12 hrs x \$175); 4 community/educational meetings \$8,400 (12 hrs x \$175; \$2,100/meeting). Supplies: \$2,000 (software \$300 [1 x \$300], printouts \$800 [800 pages x \$1/page], posters \$600 [6 posters x \$100/poster], office supplies \$300 [pens, markers, postage, paper]).

Task 2 Program Management: Personnel: \$15,000 (300 hrs). Contractual: ACRES database reporting, yearly financial reporting, quarterly reporting, MBE/WBE forms \$8,750 (50 hrs x \$175).

Travel: Two staff to attend two conferences \$8,200 (flights at \$800, 3 nights in hotel at \$250/night, incidentals and 3 days per diem at \$100/day, \$200 conference registration x 2 attendees x 2 events).

Task 3 Cleanup Planning: Personnel: Report reviews \$400 (2hrs per report x 4 reports).

Contractual: 1 finalized ABCA at \$7,000; 1 Abatement Specification at \$16,150 (Project Designer: 25hrs x \$200, Sr. Industrial Hygienist: 30hrs x \$185, Staff Industrial Hygienist: 40 hrs x \$140); 1 Infrastructure Evaluation at \$25,000 (Senior Engineer: 50hrs x \$200, Staff Engineer: 100hrs x \$150); 1 Site Reuse Vision at \$47,500 (Principal Planner: 80hrs x \$200, Senior Planner: 120hrs x \$175, Environmental Planner: 60hrs x \$175).

Task 4 Cleanup: Personnel: site access & oversight: \$8,000 (160hrs) Construction: Hazardous materials abatement and disposal at \$240,000 (quote given by abatement contractors).

Task 5 Cleanup Oversight: Contractual: daily oversight at \$18,750 (\$1,250/day x 15 days); equipment at \$3,750 (\$250/day x 15 days); analytical at \$5,000; mileage at \$1,080 (\$72/day x 15 days); and a final report at \$6,000 for a total of \$34,580.

| Category | Tasks | | | | | Totals |
|---------------------|-----------------|-----------------------------|-----------------|------------------|--------------------------|------------------|
| | <i>Outreach</i> | <i>Programmatic Support</i> | <i>Planning</i> | <i>Cleanup</i> | <i>Cleanup Oversight</i> | |
| Personnel | \$6,500 | \$15,000 | \$400 | \$8,000 | | \$29,900 |
| Travel | | \$8,200 | | | | \$8,200 |
| Supplies | \$2,000 | | | | | \$2,000 |
| Contractual | \$14,000 | \$8,750 | \$95,650 | | \$34,580 | \$152,980 |
| Construction | | | | \$240,000 | | \$240,000 |
| Total Budget | \$22,500 | \$31,950 | \$96,050 | \$248,000 | \$34,580 | \$433,080 |

d. Plan to Measure and Evaluate Environmental Progress and Results: To ensure this EPA Brownfield Cleanup Grant is on schedule, the City’s Brownfields Team, which will include the QEP, will meet quarterly to track all outputs identified in 3.b. using an Excel spreadsheet. The City will report progress to the EPA via quarterly reports, and project expenditures and activities will be compared to the project schedule to ensure the project will be completed within the four-year time frame. Site information will be entered and tracked in the ACRES database. Outputs to be tracked include QAPP; ABCA; cleanup plan development; contractor procurement; quarterly, annual, and closeout reports; and the number of community meetings. The outcomes to be tracked include community participation, acres ready for reuse, redevelopment dollars leveraged, and jobs created. In the event the project is not progressing efficiently, countermeasures are in place to address the problem, which include making monthly calls to the EPA Project Officer and, if needed, revising the existing Work Plan to get back on schedule.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Programmatic Capability i. Organizational Structure & ii. Description of Key Staff: The Ideal City Council is the steering committee for the cleanup site project. The City is a Member Government of the River Valley Regional Commission (RVRC), who will provide programmatic support and direction for this grant project. The RVRC is a nonprofit planning organization dedicated to coordinating orderly growth, economic prosperity, and regional development for a 16-county region in west central Georgia. The RVRC is overseen by a 40-member council representing all 16 counties, with an executive board and council chair. The RVRC has a long history of managing federal, state, regional, and local grants for its members. The RVRC Director of Planning and Government Services, **Ms. Tracie Hadaway**, will serve as

the **Brownfield Program Director** and will be responsible for the expenditure of funds and completion of administrative and financial requirements of the project. Ms. Hadaway has held her current position at the RVRC for over a year. Ms. Hadaway has a long history as a Planning and Economic Development Director and County Planner for local governments. Her typical duties include managing the preparation of local Comprehensive Plans for the RVRC's 16-county region, developing a Regional Plan and a Regional Economic Development Strategy for the RVRC service area, preparing the RVRC's Urban Redevelopment Plans, and the preparation and administration state and federal grants. Ms. Schneider joined the RVRC team in 2017. She will be assisted by **Ms. Laura Schneider**, RVRC Regional Planner. Her daily duties include regional planning, grant administrator, all project mapping, and overseeing various projects. Laura will serve as the **Brownfield Program Manager**. She will be responsible for performing various administrative duties associated with the Brownfield Program. Ms. Hadaway and Ms. Schneider will be assisted by **City Mayor Samuel Jenkins**, who will serve as the City's **Brownfield Program Finance Manager**. Mayor Jenkins will be responsible for managing the financial aspects of the brownfield grant. A qualified environmental professional (QEP) will assist with the technical and reporting aspects of the project.

iii. Acquiring Additional Resources: The City will procure a QEP and subcontractors to assist with technical and reporting aspects of the Brownfield Cleanup project. Procurement procedures will comply with both the local contracting and procurement process and with EPA requirements for "Professional Service." The City will promote strong practices, local hiring and procurement, and will link members of the community to potential employment opportunities for all brownfield-related redevelopment via community outreach practices and project updates to project partners. The City recognizes the importance of ensuring that the benefits of this grant extend beyond environmental improvement to meaningful economic and social impacts.

b. Past Performance and Accomplishments ii. Has Not Received an EPA Brownfields Grant but has Received Other Federal or Non-Federal Assistance Agreements: (1) Purpose and Accomplishments: In FY13, the City received a Community Development Block Grant from the Georgia Department of Community Affairs (DCA) in the amount of \$250,000. The funding was used for water and sewer improvements in a low-income area. The City used the grant funding to replace 2-inch water lines, install fire hydrants, and for the rehabilitation of a lift station that was in dire need of repair. The City was able to rehabilitate the water infrastructure for \$214,198.59. Additionally, COVID-19 funding was received through the CARES Act. The funding came in two increments. The first came in September 2021, and the second came in August 2022. Each amount was \$81,969.50 for a total of \$163,939. The City has until the end of this calendar year to spend all of the funding, and currently has \$546 remaining. The funding was spent on water- and sewer-related projects (repairing lines, replacing a motor in a lift station, chemicals).

(2) Compliance with Grant Requirements: All tasks of both grants were completed, and the outcomes outlined in the grant proposals were achieved. The DCA grant was closed by DCA in March 2016 as complete with no outstanding monitoring findings. The CARES Act funding has been in compliance throughout its duration and will close with all funds expended in the winter of 2024. The Brownfield Project Team is skilled in project management and will monitor all grant activities to ensure compliance with all financial reporting requirements.

City of Ideal, GA
FY25 Brownfield Cleanup Grant
Threshold Criteria

Threshold Criteria

1. Applicant Eligibility

- a. The City of Ideal, GA, is eligible to apply for the EPA Brownfields Cleanup Grant as a general-purpose unit of local government as defined under 2 CFR § 200.1.
- b. The City is not exempt from Federal taxation under section 501(c)(4) of the Internal Revenue Code.

2. Previously Awarded Cleanup Grants

The former Ideal School site located at 106 Martin Luther King (MLK) Drive has not received funding from a previously awarded EPA Brownfields Cleanup Grant.

3. Expenditure of Existing Multipurpose Grant Funds

The City does not have an open EPA Brownfields Multipurpose Grant.

4. Site Ownership

The City is the current owner of the site. The City acquired the property from the Macon County School Board in 1981.

5. Basic Site Information

- a) Site Name: Former Ideal School
- b) Site Address: 106 MLK Drive, Ideal, GA 31041

6. Status and History of Contamination at the Site

- a) The Former Ideal School is contaminated with asbestos-containing materials (ACMs) and other regulated waste. The Cleanup Grant funding will be used for the cleanup of hazardous substances at the property.
- b) The site is on an approximately 18.7-acre parcel and contains a city park in the north area, a single vacant structure in the middle area of the parcel, and wooded land in the larger south area of the parcel. The vacant structure, formerly used as an elementary school among other eventual purposes, is in its original configuration and totals approximately 30,000 square feet. The on-site structure was constructed sometime between 1951 and 1965.
- c) A previous Phase I Environmental Site Assessment (ESA) and Phase II ESA have been conducted at the site. Hazardous building materials were identified at the former Ideal School building.
- d) Materials used in the construction of the building include ACMs and other regulated waste. Three (3) homogenous materials have been identified as ACM (interior and exterior).

7. Brownfields Site Definition

The City **affirms** that site is:

- a) NOT a facility (or proposed for listing) on the National Priorities List (NPL);
- b) NOT a facility subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA; and
- c) NOT a facility that is subject to jurisdiction, custody, or control of the US government.

8. Environmental Assessment Required for Cleanup Grant Applications

The following site assessment reports have been completed for the site at 106 MLK Drive:

- Phase I ESA: April 5, 2022
- Hazardous Materials Inspection Report: April 19, 2024
- Site Assessment Report: May 31, 2024

9. Site Characterization

- a. Not Applicable
- b. Not Applicable.
- c. The site is contaminated with hazardous building materials and is not eligible to be enrolled in the state voluntary response program:
 - i. Attached is a letter from Georgia Environmental Protection Division (GAEPD) explaining why the site is not eligible to be enrolled.
 - ii. An Environmental Professional, Mr. Jason Cooper, as defined in 40 CFR § 312.10 has certified that there is a sufficient level of site characterization from the environmental site assessments performed to date for the remediation work to begin on the site.

10. Enforcement or Other Actions

The City **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 (106 MLK Drive).

11. Sites Requiring a Property-Specific Determination

The City **affirms** that the site at 106 MLK Drive does not require property-specific determination to be eligible for EPA Brownfield Grant funding.

12. Threshold Criteria Related to CERCLA/Petroleum Liability

a. Property Ownership Eligibility – Hazardous Substance Sites

i. EXEMPTIONS TO CERCLA LIABILITY

(1) Indian Tribes

Not Applicable.

(2) Alaska Native Village Corporations and Alaska Native Regional Corporations

Not Applicable.

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

- (a) The City acquired the property through inter-governmental transfer (quitclaim deed) from the Macon County Board of Education.
- (b) The property was acquired by the City in 1981.
- (c) Due to the structure's age, hazardous substances were present on the property at the time of the City's acquisition.
- (d) The City affirms that it has not caused or contributed to any release of hazardous substances at the site.
- (e) The City affirms that it has not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.

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

(1) Publicly Owned Brownfield Sites Acquired Prior to January 11, 2002

- (a) The City acquired the property through inter-governmental transfer (quitclaim deed) from the Macon County Board of Education.
- (b) The property was acquired by the City in 1981.
- (c) Due to the structure's age, hazardous substances were present on the property at the time of the City's acquisition.
- (d) The City affirms that it has not caused or contributed to any release of hazardous substances at the site.
- (e) The City affirms that it has not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.

iii. LANDOWNER PROTECTIONS FROM CERCLA LIABILITY

(1) Bona Fide Prospective Purchaser Liability Protection

Not Applicable.

Non-Publicly Owned Sites Acquired Prior to January 11, 2002

Not Applicable.

iv. SITES WITH HAZARDOUS BUILDING MATERIAL THAT IS NOT RELEASED INTO THE ENVIRONMENT

The City affirms that there have been no releases or threats of releases of hazardous substances from building materials into the outdoor environment.

b. Property Ownership Eligibility – Petroleum Sites

i. INFORMATION REQUIRED FOR A PETROLEUM SITE ELIGIBILITY DETERMINATION

Not Applicable.

13. Cleanup Authority and Oversight Structure

- a) The site is not currently, nor will it be, enrolled in Georgia VCP Program due to the nature of contamination (asbestos and lead paint), as these contaminants are not addressed by the VCP Program. The Georgia Environmental Protection Division regulates licensure and waste disposal for asbestos abatement activities. The EPA will also be consulted to ensure that cleanup activities are protective of human health and the environment.

The City will hire a qualified environmental professional (QEP) prior to implementing abatement/remediation activities. The City will comply with competitive procurement provisions of 2 CFR §§ 200.317 through 200.327 for contracting the QEP. The contractor will provide the technical expertise required to conduct, manage, and oversee the cleanup, ensuring the adherence to applicable state and federal regulations and requirements.

- b. Given the localization of the contamination; the City affirms that access to neighboring properties is not necessary for cleanup to occur.

14. Community Notification

a. Draft Analysis of Brownfield Cleanup Alternatives

The City announced its intent to apply for cleanup funding for the 106 MLK Drive site and proposed redevelopment on October 30, 2024. A draft ABCA for the site and this application was made available on October 30, 2024, for public review and comment. These documents summarized information about:

- the site and contamination issues, cleanup standards, and applicable laws;
- the cleanup alternatives considered; and
- the proposed cleanup.

b. Community Notification Ad

A community notification ad requesting public input was published on October 30, 2024, in the local newspaper and through the River Valley Regional Commission's website at <https://rivervalleyrc.org/>. A copy of this grant application, including the draft ABCA, was made available for public review and comment on October 30, 2024.

c. Public Meeting

A presentation was made during a scheduled community meeting on November 5, 2024, at 7:00 p.m. The City documented participant attendance and comments made during the meeting.

d. Submission of Community Notification Documents

The following community notification documents are included as an attachment to this proposal:

- a copy of the draft ABCA;
- a copy of the ad that demonstrates notification to the public and solicitation for comments on the application and that notification to the public occurred at **14 days** before the application was submitted to the EPA;
- meeting notes from the public meeting; and
- meeting sign-in sheets/participant lists.

***There were no public comments received and therefore no responses** to those comments attached to this packet. *

15. Contractors and Named Subrecipients

- **Contractors.**
Not Applicable.
- **Named Subrecipients.**
Not Applicable.



ENVIRONMENTAL PROTECTION DIVISION

Jeffrey W. Cown, Director

Land Protection Branch
2 Martin Luther King, Jr. Drive
Suite 1058
Atlanta, Georgia 30334
404-657-8600

October 24, 2024

VIA ELECTRONIC MAIL in care of: lschneider@rivervalleyrc.org

Honorable Samuel Jenkins
Mayor
City of Ideal
605 Tom Watson Avenue
Ideal, GA 31041

RE: State Acknowledgement Letter – FY25 Brownfield Cleanup Grant Application
Former Ideal School
106 MLK Drive, Ideal, Macon County, Georgia

Dear Honorable Mayor Jenkins:

The Georgia Environmental Protection Division (GAEPD) acknowledges that the City of Ideal plans to conduct the cleanup of a brownfield site and is applying for an FY25 EPA Brownfields Cleanup Grant. The City of Ideal has developed an application requesting site-specific federal Brownfields Cleanup funding for the former Ideal School located at 106 Martin Luther King, Jr. Drive in Ideal, Georgia. The site was assessed under the River Valley Regional Commission's EPA Brownfield Assessment Cooperative Agreement, BF-00D94519-0, via a Phase I ESA, Phase II, and Hazardous Materials Investigation. The results of the assessment efforts revealed asbestos-containing materials (ACM) and lead-based paint (LBP) in the building materials.

GAEPD affirms that the former Ideal School site:

- i. is not eligible to be enrolled into the Georgia Brownfield Program by the City of Ideal because they have owned the property for more than 30 days pursuant to the Georgia Brownfield Act (Act), and because a demonstration has not been made that the property meets the qualifying property criteria as enumerated in the Act, and
- ii. is not eligible to be enrolled under the Georgia Voluntary Remediation Program Act because a demonstration has not been made that a qualifying release has occurred as ACM and LBP in building materials are regulated under other GAEPD programs.

GAEPD would like to take this opportunity to encourage EPA's positive decision in making a grant award to the City of Ideal for such cleanup. A successful award would greatly assist this community in their redevelopment efforts. For any questions regarding this letter, please contact me at 470-524-0513.

Sincerely,

Jason. Metzger
Program Manager
Response and Remediation Program