



P.O. Box 259, 419 Bourne Avenue, Somerset, KY 42501 • 606.679-8560 •

NARRATIVE INFORMATION SHEET

1. Applicant Identification:
OakPointe Centre, Post Office Box 259, Somerset, KY 42501
(501(c)3 nonprofit organization)
2. Funding Requested:
 - a. Grant Type: Single Site Cleanup
 - b. Federal Funds Requested: \$999,821
3. Location:
 - a. City: Somerset
 - b. County: Pulaski
 - c. State: Kentucky
4. Property Information:
Former Palm Beach Factory, 419 Bourne Avenue, Somerset, KY 42501
5. Contacts:
 - a. Project Director:
Brenda Russell, Phone number 606-305-1033
Email: oakpointecentre@gmail.com
Mailing address: P. O. Box 259, Somerset, KY 42501
 - b. Chief Executive/Highest Ranking Elected Official:
Jeremy Cole, Board President, Phone number: 606-875-2331
Email: jeremy.cole@pulaski.kyschools.us
Mailing address: P. O. Box 259, Somerset, KY 42501
6. Population: City of Somerset population: 11,954 (census.gov)
7. Other Factors: Not Applicable
8. Releasing Copies of Applications: Not Applicable; the application does not contain confidential, privileged, or sensitive information.

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

a. Target Area and Brownfields

i. Background and Description of Target Area:

OakPoint Centre, a 501(c)(3) designated nonprofit organization, is seeking \$999,821 in EPA Cleanup Grant funding to remediate contamination at a former garment factory located in the City of Somerset, Kentucky. **Census tract 21199930600 is the target area of this grant proposal where the cleanup activities will occur.** Somerset is located in Pulaski County, Kentucky, on the northeastern edge of Lake Cumberland and just west of the Eastern Coalfield Region. Somerset has a population of 11,954 persons, 30.7% of whom live in poverty (census.gov/quickfacts). Historically, the City of Somerset has been a manufacturing town. Somerset began to grow when the Southern Railroad was completed in 1875. Railroad employees and travelers brought many businesses and additional interests to Somerset's "South End." A number of industrial establishments followed by the mid-twentieth century in the immediate vicinity of Somerset. Among the largest was the **Palm Beach Company, the property targeted for cleanup through this grant.** Unfortunately, Palm Beach closed in 2002. An additional seven factories have closed resulting in more than 600 job losses in the past decade, which is more than 12% of Somerset's workforce (statsamerica.org/town).

The vacant factories create brownfields, as well as former railroad maintenance buildings in the target area. When traffic flow moved away from the downtown area to Highway 27 and the 914 bypass, businesses followed, leaving several commercial properties vacant and falling into disrepair. The impacts include blight, vagrancy, crime, further disinvestment, lower property tax value, and environmental and human health threats from hazard substance contamination. The owner of property where the county's only homeless shelter is located, will not renew its lease. Therefore, vagrancy will become an even greater problem at these unsecured brownfield sites, endangering those who have no other option than to seek shelter there.

The EPA Cleanup grant will provide the necessary funds to remediate the contaminants at the Palm Beach clothing factory. Once the environmental threats of the property, OakPointe Centre is committed to the redevelopment of property and has resources in places to do so. The project has enthusiastic public support, and the support of both city and county governments. Committed leveraged funds, volunteers, in-kind staff and equipment have been pledged toward the renovation, once the hazardous substances are safely removed or abated by licensed contractors. EPA cleanup funds can restore this large eyesore to a community asset, serving as a catalyst for neighborhood revitalization

ii. Description of the Brownfield Site:

The property targeted for cleanup is the former Palm Beach Company factory located at 419 Bourne Avenue in Somerset, Kentucky. The building was erected in 1946 by Somerset Industries, a corporation formed by local citizens interested in the development of their community. Palm Beach was a men's clothing manufacturer which employed 800 people at its height. It provided the first opportunity for women to work in Pulaski County, as women operated almost all of the sewing machines. Palm Beach closed its doors in 2002. Somerset-Pulaski County's economic development foundation assumed ownership of the building when the company ceased operations. For a time, the building was leased to a cardboard manufacturing company, but it has been vacant for several years. Following a Phase I environmental site assessment (ESA), OakPointe Centre, a non-profit, took ownership in 2022. A Phase II ESA conducted in October 2022 confirmed the extensive presences of asbestos containing materials and lead based paint in both the interior and exterior of the building. The building is a split-level structure with 65,000 square feet on the upper level and 30,000 square feet on the lower level sitting on six acres of land. Both the upper and lower levels are ground level, as the land slopes sharply toward the back. The building is structurally sound, and the fire suppression system is up to code.

b. Revitalization of the Target Area**i. Reuse Strategy and Alignment with Revitalization Plans:**

OakPointe Centre describes itself “a multipurpose community building focused on providing space for education and wraparound services that will assist those living in poverty overcome barriers to self-sufficiency thus leading to an improved quality of life for them and their families.” Once the building has undergone abatement of environmental hazards and renovation is complete, OakPointe Centre will lease space to local non-profits at below market value. God’s Food Pantry, a free or very low-cost clothing center, and a feeding center/soup kitchen that serves hot, nutritious meals will be OakPointe’s anchor nonprofits. In 2021, God’s Food Pantry served more than 10,000 Pulaski County residents with 75,000 supplement food services, and have outgrown their existing space. The remaining the upper level will be subdivided in approximately 20 additional spaces for lease to other entities dedicated to assisting families living in poverty. These will include a life-skills education center, a financial education/banking partner, a medical clinic, counseling services, addiction services, shower and laundry facilities for the homeless, and other related services. OakPointe has already been in discussion with and received positive feedback from many of these organizations. The non-profits will benefit from the reduced cost rent. Some local nonprofits have lost their leases recently because the landlords can charge higher rents to for-profit interests. Being under the same roof will increase the cooperation between these organizations and led to additional client referrals. Those in need of assistance will benefit the most by having a “one-stop service center” rather than a dozen different locations all over the county. Transportation is a barrier for many low-income residents.

The lower level will be converted to a restaurant, a meeting space that will be made available to the community, and the majority will be used as a warehouse for Our Place, another 501(c)3 non-profit that works with more than 100 regional nonprofits. OakPointe will recruit a restaurant with a similar business model as DV8 located in Lexington, Kentucky. The restaurant that will function as a second chance employer for those in addiction recovery. The employees will receive a living wage while they gain experience as cooks and servers. Once they are trained and have a positive work history, they can gain traditional employment.

The anticipated \$20,000-\$25,000 monthly revenue received from lease payments will cover maintenance, utilities, insurance, and management expenses, and provide sustainability for OakPointe.

The proposed reuse aligns with local government land use plans and advances revitalization plans. City of Somerset and Pulaski County are very supportive of the proposed project. The Lake Cumberland Area Development District (LCADD) Comprehensive Economic Development Strategy (CEDS) plan is updated annually in partnership with local governments and a broad spectrum of community stakeholders to identify needs and formulate strategies to meet the needs of communities within LCADD region, including Somerset and Pulaski County. The proposed reuse advances Goal 5: “Enhance the communities in the region through improvement to social services, community facilities and livability standards.” The Lake Cumberland District Health Department’s Strategic Plan, 2016 Update, identifies seven strategic initiatives. The remediation of contaminates supports Initiative 3: “Identify and respond to current public health threats and prevent emerging public health threats.” The reuse, locating multiple non-profits and service providers in one location, supports Initiative 1: “Develop, maintain and enhance collaboration with partners, stakeholders and the community to identify and respond to health problems and threats.” Both of these plans are developed with public input and made available for comment prior to their boards’ approvals. Additionally, a public meeting was held on November 14, 2022, specifically so all interested community members could ask questions, make comments or offer suggestions regarding this project. Due to the nature of the services provided by our

community partners, we have a unique opportunity to engage underserved populations in the planning process. Only positive feedback was received.

The property is not located in a federally designated flood plain.

ii. Outcomes and Benefits of Reuse Strategy: OakPointe Centre’s goal is to assist those living in poverty overcome barriers to self-sufficiency and obtain a higher quality of life. This will be achieved through the services provided by the nonprofits located under OakPointe Center’s roof. Somerset is a rural community and each job created carries great impact. The removal of contamination and the proposed redevelopment will create or support construction related jobs. Computer training, budget and credit counseling, and addiction recovery programs will greatly impact the recipient’s economic future and the area’s workforce. Renovation of the property will reduce blight and is a potential catalyst for redevelopment of other nearby properties. Renovation will incorporate energy efficient features including green insulation such as polystyrene or cellulose, double or triple-pane and low-emissivity windows, LED lighting, high efficiency HVAC systems, and energy efficient water heaters. The proposed project will not cause the displacement of residents or businesses.

c. Strategy for Leveraging Resources

i. Resources Needed for Site Characterization: The Phase II environmental site assessment was conducted in September 2022. Conditions are unlikely to change since the contaminants are asbestos containing materials and lead based paint that will remain in place as long as they are not disturbed. The building is vacant and will remain unused until remediation occurs. OakPointe Centre is confident the Palm Beach property is fully characterized, as confirmed by the attached letter from the Kentucky Department of Environmental Protection.

ii. Resources Needed for Site Remediation: The total estimated cost for cleanup of the former Palm Beach factory building is \$999,821. The ABCA was just completed in November 2022, and takes into account current market prices of materials and Davis-Bacon Prevailing Wage Rates. OakPointe Centre has requested clean-up grant funding in the amount necessary to fully remediate the site. Additionally, the Pulaski County Judge-Executive elect, who will take office in January 2023, has committed the use of equipment if needed. The commitment letter is attached.

iii. Resources Needed for Site Reuse: God’s Food Pantry of Pulaski County has committed \$100,000 to the renovation of the former Palm Beach factory into OakPointe Centre for the purpose previously described. The confirmation letter is attached. These funds are secured, significant and relevant to the project. The Lake Cumberland Area Development District (LCADD) will assist OakPointe Centre in applying for additional funds, from the following sources:

- Community Development Block Grant: This project would be eligible for \$500,000 in CDBG funds because it meets two of the three national objectives, serving low to moderate income persons and contributing to the elimination of slum and blight. Only Cities and Counties can apply for CDBG funding with non-profits as subrecipients. The City of Somerset has already agreed to apply on behalf of OakPointe Centre.
- Appalachian Regional Commission Grant: Objective 3.5 of ARC’s 2022-2026 Strategic Plan is to redevelop and repurpose unused, underutilized, or neglected sites, and brownfields to fuel economic and community development. **Census tract 21199930600** where the site is located is classified as “distressed,” making OakPointe eligible for 80% match. If the grant request is \$500,000, God’s Food Pantry’s donation can supply the 20% matching funds.
- USDA Rural Development: provides grants and low interest loans to small business, and could potentially be used to purchase the restaurant equipment.

iv. Use of Existing Infrastructure: The proposed reuse will facilitate use of existing infrastructure by creating an additional commercial customer and generating more revenue for water, sewer, waste collection, electricity and broadband services. All of the required services and infrastructure of the needed size and capacity are in place at the site. No upgrades are needed at this time. The City of Somerset operates the water, sewer and natural gas. Upgrades and maintenance are funded from their reserve accounts or they seek grants and loans from CDBG or Kentucky Infrastructure Authority.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

a. Community Need

i. The Community’s Need for Funding: This grant will meet the needs of the community by fully funding the cleanup of a property contaminated with hazardous substances that will not occur otherwise. OakPointe Center is unable to draw on other sources of funding to carry out the environmental remediation due to the low-income population. The City of Somerset has a 30.7% poverty rate, which is more than twice the United States’ 11.4% poverty rate. Somerset’s median household income (MHI) is \$27,739, which is only 42.7% of the national MHI of \$64,994, (www.census.gov/quickfacts). The cleanup grant will facilitate the subsequent reuse by making the building safe for renovation. In addition to the financial benefits, the work conducted through the EPA will demonstrate progress to the public and more members of the community will want to participate as they see the project coming to fruition.

ii. Threats to Sensitive Populations

(1) Health or Welfare of Sensitive Populations:

The asbestos and lead based paint in the former Palm Beach factory pose health risks, including kidney and neurological disorders, lung and other cancers, asthma, and mental and developmental issues in small children. Sensitive populations who may have other risks factors, compromised immune systems, and lack access to health care are especially vulnerable. EPA’s EJScreen identifies **Census tract 21199930600** as medically underserved. Per census.gov, the target area’s sensitive population includes those age 65 and older (17.7%), disabled under age 65 (14.7%), the poor (30.7%), and children under five (3.9%), and minorities (10.9%). The former Palm Beach factory is located in what is now a primarily residential neighborhood, with homes located next door and across the street. A Head Start for Migrant Children is located in 350 feet, and a church is located within 500 feet of the building. The cleanup grant will facilitate the reduction of health threats to sensitive populations, many of whom will come to the Centre seeking assistance.

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

By cleaning-up the site contaminants, the grant will facilitate the reduction health threats to populations in the target area that suffer from a greater-than-normal incidence of diseases, including cancer and asthma, as indicated in the table below. Health data is not available on a municipal level, but Pulaski County is representative of the target area.

	Pulaski County	United States	Data Source
All Cancers Incidence*	525.0	449.4	statecancerprofiles.cancer.com
Lung and Bronchus Cancer*	87.1	56.3	statecancerprofiles.cancer.com
Prevalence of Asthma	19.0%	8.4%	cdc.gov/asthma

*age-adjusted rate per 100,000 population

(3) Promoting Environmental Justice: As previously noted, 30.7% of Somerset residents are at or below the poverty line. The Climate and Economic Justice Screening Tool identifies **census tract 21199930600** as “disadvantaged” in the following three, out of eight, categories: legacy pollution, health

burdens, and workforce development. A search of EJScreen.epa.gov, revealed that target area is a food desert, medically underserved and ranks in the top half of the state and nation for the presence of the following pollutants:

Selected Variables	Percentile in State	Percentile in USA
Diesel Particulate Matter* (µg/m³)	58	<50th
Air Toxics Cancer Risk* (lifetime risk per million)	99	80-90th
Air Toxics Respiratory HI*	95	80-90th
Lead Paint (% Pre-1960 Housing)	77	63
RMP Facility Proximity (facility count/km distance)	86	83
Hazardous Waste Proximity (facility count/km distance)	71	49
Underground Storage Tanks (count/km²)	92	72

The services offered by OakPointe Centre will promote environmental justice by providing disadvantaged, underserved populations with services and opportunities to improve their quality of life.

b. Community Engagement

i. and ii. Project Involvement and Project Roles:

The following diverse group of community partners have committed to have meaningful involvement in the project and will provide valuable input in regard to the property cleanup and future reuse:

Partner Name	Point of contact	Specific role in the project
Lake Cumberland Area Development District	Waylon Wright, Executive Director 270-866-4200, Waylon@lcadd.org	Provide grant preparation and administration for additional funding
Lake Cumberland District Health Department	Amy Tomlinson, Executive Director 606-678-4761 amyc.tomlison@lcdhd.org	Conduct health monitoring
Somerset-Pulaski County Chamber of Commerce	Bobby Clue, Executive Director 859-552-3547 bobby.clue@somersetpulaskichamber.com	Promote the project to the business community
Pulaski County Government	Marshall Todd, Judge-Executive Elect 606-875-5327, [REDACTED]	Committed in-kind staff and equipment to project
City of Somerset	Alan Keck, Mayor, 606-679-6366 akeck@cityofsomerset.com	Committed meeting space and annual financial support
God’s Food Pantry	Danita Bush, Assistant Director 606-679-8560 godspantrypulaski@gmail.com	Fully committed future tenant of OakPointe Centre
Our Place	Melissa Nevels, Operations Manager 606-802-2009 ourplacewarehouse@gmail.com	Fully committed future tenant of OakPointe Centre
Immanuel Baptist Church	Ron Shepherd, Pastor 606-679-3925 [REDACTED]	Assist with public education and project notification of target area residents

iii. Incorporating Community Input: OakPointe Centre will make every effort to engage the public throughout all phases of clean-up and redevelopment, obtaining public input, and providing informative

progress updates. OakPointe Centre will solicit, consider, and respond to residents' questions, comments and concerns in regard to the redevelopment activities in their community. The OakPointe Centre will follow the EPA’s *Steps for Effective Public Involvement* which includes planning and conducting public involvement activities, as well as reviewing and implementing input and providing feedback. Progress will be communicated to the public through a variety of media outlets in order to engage its targeted area and ensure project success. OakPointe Centre will use partner agencies, websites, and newspapers to advertise public meetings/webinars and solicit input. Meetings will use platforms, such as Zoom or Teams, to increase opportunities for participation, especially when COVID or Flu cases are rising. Brownfield educational and project information will be distributed at community events.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a. Proposed Cleanup Plan

ACM and LBP were confirmed throughout the interior and exterior of the building.

The ABCA outlines three alternative methods for addressing environmental concerns at the site:

- 1) Alternative No. 1 - No Action
- 2) Alternative No. 2 - Removal/Abatement (ACM and flaking, loose, and flaked LBP)
- 3) Alternative No. 3 – Stabilization/Encapsulation of remainder of LBP with O&M Plan

Alternative 1: No Action is ineffective for controlling or preventing exposure of receptors to building contaminants. Alternatives 2 and 3 are needed to fully remediate the building. The ABCA discusses anticipated costs for each. Completing both alternatives will safely allow for cost-effective elimination of the contaminants and foster redevelopment. Alternatives are summarized below.

Alternative 2: Removal/Abatement –Is effective in removing the risk of exposure to ACM and LBP. ACM will be abated by a Kentucky licensed abatement contractor. Removal of LBP will be accomplished by hand methods, by scraping, by abrasive blasting methods, e.g., using dry ice or sodium bicarbonate media, sand, air, wet/water, vacuum, or centrifugal to remove lead-based paint. Some of these methods result in decreased volumes of waste streams and savings in labor, time, energy, and abrasive material. Note that complete removal of LBP and ACM from all surfaces is not considered practical thus requiring the need for Alternative 3.

Alternative 3: Stabilization/Encapsulation - This alternative involves applying a coating(s) or lead barrier compound on surfaces to remain after removing flaking and, loose paint. Coating types could include epoxy, acrylic, polyurethane, oil-base, and latex. Important properties to consider when choosing a coating include elongation (i.e., elasticity or rigidity), dry film thickness, drying or curing time, and compatibility with existing surfaces. An encapsulant such as Fiberlock Technologies Inc., LBC or similar product may be utilized. An O&M Plan will be prepared to manage long term risks.

Disposal requirements include Per 401 KAR 58:040 (Requirements for Asbestos Abatement Entities), ACM disposal will occur at a landfill that has approval from the KDWM to accept asbestos-containing waste according to the provisions of Title 401, Chapter 47, and shall meet all other applicable local, state, and federal laws. Building components that are removed without being abated will be transported to an off-site permitted landfill for proper disposal.

Foreseeable changing climate conditions would have little or no impact on the effectiveness of proposed remedial options under consideration.

3b. Description of Tasks / Activities, and Outputs

Tasks/Activities:	Task 1 – Cooperative Agreement Oversight
i. Project Implementation	OakPointe Centre, with the assistance of LCADD, will oversee grant implementation, including financial and programmatic management to ensure compliance with the cooperative agreement, schedule, and terms and conditions for the four-year grant period. OakPointe Centre will

	initiate a competitive qualification-based selection process in compliance with state and federal (2 CFR 200.317-326) guidelines to select a Qualified Environmental Professional (QEP) firm. With the assistance of LCADD and QEP, OakPointe Centre will ensure all quarterly reports, MBE/WBE forms, and the ACRES database updates are completed on time. OakPointe City project director will attend regional and national Brownfield conferences.
ii. Anticipated Project Schedule:	This task will be initiated upon grant award and will continue throughout the four-year project period.
iii. Task/Activity Lead(s):	OakPointe Centre, LCADD and QEP
iv. Output(s):	4 conferenced attended, 16 Quarterly reports, 1 closeout report, ACRES Updates, annual MBE/WBE reporting
Tasks/Activities:	Task 2 – Community Education & Outreach
i. Project Implementation	This task includes publicity, meetings, and distribution of information to the public as the project progresses. Public/neighborhood meetings will be semi-annually at a minimum and more frequently depending on project process. Supplies needed for public meetings will include printed handout materials and public notices advertised via newspaper. Community Involvement Plan (CIP) will be prepared.
ii. Anticipated Project Schedule:	This task will be initiated within 3 months of grant award and continue throughout the project period.
iii. Task/Activity Lead(s):	OakPointe Centre, LCADD, and QEP
iv. Output(s):	A minimum of 8 community meetings, 1 CIP
Tasks/Activities:	Task 3 – Remedial Planning
i. Project Implementation	This task includes preparing the QAPP, Health and Safety Plan, completing the ABCA, coordinating with state and federal regulatory agencies to prepare plans, specifications and bid documents for selection of the cleanup contractor, which will be procured in accordance with federal guidelines (2 CFR 200.317-326).
ii. Anticipated Project Schedule:	This task will be initiated within 3 months after award and completed within 12 months after award.
iii. Task/Activity Lead(s):	Qualified Environmental Professional (QEP)
iv. Output(s):	1 QAPP, 1 ABCA, 1 HASP, remedial plan, 1 set of bid documents.
Tasks/Activities:	Task 4 – Site Cleanup
i. Project Implementation	This task includes anticipated contractor costs for the removing of asbestos containing materials, and flaked lead-based paint, along with proper disposal of all waste materials and the encapsulation of residual lead-based paint. This task will also include QEP oversight of the selected abatement contractor by our selected environmental consultant and air monitoring and asbestos clearance sampling. Health monitoring will be conducted by the Lake Cumberland District Health Department.
ii. Anticipated Project Schedule:	This task will be initiated within 6 months of award and completed within 30 months after award.
iii. Task/Activity Lead(s):	QEP, State Licensed Cleanup Contractor and Health Department
iv. Output(s):	Completion of cleanup, report and Certification Letter to the USEPA.

c.i., c.ii. and c.iii. Cost Estimates

Budget Categories	Project Tasks (\$)				Total
	Task 1: Cooperative Agreement Oversight	Task 2: Community Education & Outreach	Task 3: Remedial Planning	Task 4: Cleanup	
Personnel	\$23,040	\$960			\$24,000
Fringe Benefits					
Travel	\$6,500				\$6,500
Equipment					
Supplies		\$1,000			\$1,000
Contractual		\$2,000	\$74,375	\$847,946	\$924,321
Other	\$40,000	\$4,000			\$44,000
Total Direct Costs	\$69,540	\$7,960	\$74,375	\$847,946	\$999,821
Indirect Costs					
Total Budget	\$69,540	\$7,960	\$74,375	\$847,946	\$999,821

NOTE: The Community Education and Outreach budget will be supplement with in-kind services provided by the project partner organizations.

Task 1 – Cooperative Agreement Oversight (\$69,540)

Personnel: \$23,040 OakPointe Project Director (12 hours per month x 48 months x \$40/hr = \$23,040); **Travel: \$6,500** grantee training will include attendance of the OakPointe project director to four regional or national Brownfield conferences. The budgets include: airfare: one person for four conferences @\$425 per trip (\$1,700); parking/mileage/taxi \$120 @ 4 trips (\$480); lodging 1 person @ \$220 each night for 4 days and 4 trips (\$3,520); and per diem of \$50 each day for 1 person 4 days and 4 trips (\$800). This budget utilized the most recent national and regional Brownfield conferences to determine budget. **Other: \$36,000** Lake Cumberland Area Development District (LCADD) will assist in procurement, financial management, quarterly reporting and additional programmatic duties throughout grant (\$10,000 per year X 4 years = \$40,000).

Task 2 – Community Education & Outreach (\$7,960)

OakPointe Centre supplies for printed materials (\$1,000). Oak Point Centre staff to coordinate, advertise, and conduct a minimum of eight meetings (8 meetings x 3 hours x \$40 = \$960) Qualified Environmental Professional (QEP) will prepare visual presentations of progress reports and attend all meetings to discuss project procedures and answer technical questions (\$2,000). The Lake Cumberland ADD will assist in this task by preparing the Community Involvement Plan (\$2,000) and attend all meetings (\$2,000). Partner organizations will provide in-kind outreach to their membership.

Task 3 – Remedial Planning (\$74,375)

This task includes completing the final ABCA, QAPP, Health & Safety Plan, Remedial Action Plan, O&M Plan, Bid Documents/Specifications, coordinating with state and federal regulatory agencies, specifications and bid documents for selection of the abatement contractor.

Task 4 – Cleanup (\$847,946)

This task includes anticipated contractor costs for the removing of asbestos containing materials and flaked lead-based paint, along with proper disposal of all waste materials and the encapsulation of residual lead-based paint. (\$820,746). This task will also include professional oversight of the selected

abatement contractor(s) by the QEP and air monitoring and asbestos clearance sampling, cleanup report to the KDEP and USEPA (\$27,200). Additionally, the Lake Cumberland District Health Department will conduct health monitoring in accordance with EPA requirements.

d. Measuring Environmental Results: OakPointe Centre Project Director, Brenda Russell, with assistance from LCADD staff, will be responsible to track the project's progress and ensure the project remains on schedule, within budget, and completed in compliance with all EPA regulations prior to the four year-year performance period. Each quarterly report submitted to EPA will include an update of project expenditures and list the activities accomplished. Additionally, site-specific information will be entered and tracked in the online ACRES database. Anticipated outputs include: 1) community involvement plan, 2) eight community meetings, 3) development of a final ABCA, 4) state- and federally-approved remediation plan, 5) health and safety plan, 6) QAPP 7) bid specifications 8) site remediation, 9) clean up report 10) sixteen quarterly reports 11) successful grant closeout report. Anticipated outcomes that go beyond the grant include 1) a remediated and occupied building 2) jobs created, 3) funds leveraged, 4) more vibrant downtown, 5) improved health among sensitive population, 6) improved on environmental justice issues, 7) enhanced environmental stewardship, 8) on-going community engagement meetings focused on Brownfields. Restoration of the Palm Beach factory will be a catalyst site for other properties.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Programmatic Capability

i. and ii. Organizational Structure and Description of Key Staff:

Formed in 2022, OakPointe Centre is a 501(c)3 nonprofit organization overseen by a 16-member person Board of Directors. The Board is comprised of individuals with an exceptional level of expertise and possess a broad-spectrum of professional backgrounds, including an attorney, retired teacher, adult day care director, hospital director of patient ministries, homeless shelter director, nonprofit clothing ministry director, bank vice-president, retired director with UK Cooperative Extension Service, several private business owners and four pastors. With the financial assistance of the Brownfield Cleanup grant, this group of citizens have the knowledge, dedication and community connections to make OakPointe Centre's mission a reality.

Ms. Brenda Russell, the Executive Director of OakPointe Centre, will be the Brownfields Project Director, and will be personally involved with every phase of the project. Ms. Russell has more than 20 years of non-profit experience, and has previously overseen administrative, and financial requirements of the federal grants received with other organizations. To gain more knowledge of EPA Brownfield programs, Ms. Russell attended the both the Florida-Alabama Regional Brownfields Conference and National Brownfields Conference earlier this year. Ms. Russell will ensure project implementation, budget oversight, community outreach, and approve expenditures of funds.

The OakPointe Centre will receive additional administrative support from the Lake Cumberland Area Development District (LCADD), a subrecipient of grant. LCADD, a regional planning council, has successfully assisted the local communities with grant preparation and administration for more than 50 years. LCADD was awarded a FY2018 \$300,000 EPA Community-Wide Assessment Grant. All grant requirements were met including compliance with the work plan, schedule, and terms and conditions. Progress was reported in ACRES including 20 Phase I ESAs, 10 Phase II ESAs, and 10 Site Specific QAPPs. A total of 210.41 acres across eight properties are ready for reuse. The grant was completed over a year ahead of schedule. LCADD is currently the lead applicant and grant administrator for FY2022 \$300,000 Coalition Assessment grant. The project is proceeding on schedule and in compliance with the Work Plan. LCADD's Community Development Specialist, Brendon Kearney, is the project manager for LCADD's current Coalition Assessment grant, and will provide the project management

and administration responsibilities for this grant. If the situation arises where Mr. Kearney is unable to continue administering the grant, Ms. Stephanie Smith will take over day to day management of the grant. Ms. Smith has been involved with this project since its inception. Mr. Kearney and Ms. Smith are both certified Community Development Block Grant administrations, and are experienced in managing several other federally grants, such as USDA, ARC, AML and EDA. Mr. Kearney attended the 2022 National Brownfields Conference. Ms. Smith attended the 2022 Florida-Alabama Brownfields conference. Their knowledge and experience will ensure correct and timely reporting and compliance. They are experienced in federal procurement requirements, preparing quarterly, annual and closeout reports, MBE/WBE reporting, submitting payment requests and complying with cooperative agreements. LCADD has the experience necessary to assist the OakPointe Centre in successfully implementing a Brownfield Clean-up grant in compliance with all grant requirements.

iii. Acquiring Additional Resources: The OakPointe Centre will acquire the services of an environmental consultant and abatement contractor(s) in accordance with the grant programs regulations (2 CFR 200 and 2 CFR 1500). Request for Qualifications and Request for Bids will be publicly advertised. Local, Minority and Women Owned companies will be encouraged to respond. The consultant will be selected primarily on the basis of experience with EPA Brownfields Cleanup projects. Abatement contractor(s) will be selected on the basis of required certification, price and availability. The selected consultant and contractor(s) will assist with the technical management and performance of environmental cleanup activities. LCADD will assist OakPointe with financial and project management. Additionally, LCADD will assist the OakPointe in obtaining additional funds needed to complete the renovation.

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: OakPointe Centre was organized in the summer 2022, and in this short amount of time, they have received several awards, listed below, which is a testament to their fundraising ability and to the community support for this project.

Funding Agency:	Amount:	Accomplishments / Outputs:
Linebach Funkhouser	\$9,500	Grant for ACM and LMP surveys performed by Chase Environmental.
God's Food Pantry	\$1,000	Grant for fire suppression system inspection
Citizens National Bank	\$500	Grant for website design
City of Somerset	\$1500	Grant for grounds maintenance
Lake Area Foundation	\$600	Grant for two pallet jacks to move the large number of items left in the warehouse

(2) Compliance with Grant Requirements:

The above projects were completed in a timely manner. The accomplishments complied with funding agreement requirements. All required documentation was reported appropriately.

THRESHOLD CRITERIA

1. Applicant Eligibility:

OakPointe Centre affirms that it is a nonprofit organization. Documentation of tax-exempt status under section 501(c)(3) of the Internal Revenue Code is attached.

2. Previously Awarded Cleanup Grants

OakPointe Centre affirms that the proposed site has not received funding from a previously awarded EPA Brownfields Cleanup Grant.

3. Expenditure of Existing Multipurpose Grant Funds

OakPointe Centre affirms it does not have an open EPA Brownfields Multipurpose Grant.

4. Site Ownership

The OakPointe Centre holds fee simple title and is sole owner of the property identified for purposes of this cleanup proposal. The OakPointe Centre will retain sole ownership of this property for the duration of time in which Brownfields Cleanup Grant funds are disbursed for the cleanup of the site.

5. Basic Site Information

- a) Name: Palm Beach factory
- b) Address: 419 Bourne Ave., Somerset, Kentucky 42501
- c) Current Owner: OakPointe Centre (the Applicant)

6. Status and History of Contamination at the Site

- a) The site is contaminated with hazardous substances
- b) The site was previously utilized a garment sewing factory. It is currently not in use.
- c) Environmental concerns are confirmed asbestos containing materials and lead based paint throughout the structure, both on the exterior and interior of the building.
- d) The building is contaminated due to building materials that were considered safe at the time of construction, but are now known to cause cancer, asthma and other health problems.

7. Brownfields Site Definition

OakPointe Centre affirms that the site meets the definition of a brownfield site and is NOT:

- a) listed or proposed for listing on the National Priorities List,
- b) 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) subject to the jurisdiction, custody, or control of the United States government

8. Environmental Assessment Required for Cleanup Grant Applications

A Phase II ESA was conducted by a qualified environmental professional in accordance with current ASTM standards and dated October 7, 2022. The assessment focused on asbestos and lead-based paint.

9. Site Characterization

- a. N/A
- b. N/A

- c. i. Current letter from the Kentucky Department for Environmental Protection is attached. The State does not have regulatory authority over hazardous substances contained inside of a building.
- ii. The Kentucky Department for Environmental Protection certifies in the attached letter that there is a sufficient level of site characterization from the environmental site assessment performed to date for the remediation work to begin on the site.

10. Enforcement or Other Actions

OakPointe Centre affirms there are no known ongoing or anticipated environmental enforcement or other actions related to the site for which Brownfields Grant funding is sought.

11. Sites Requiring a Property-Specific Determination

The subject site does not require a property-specific determination.

12. Threshold Criteria Related to CERCLA/Petroleum Liability

- a. Property Ownership Eligibility – Hazardous Substance Sites
- iii. LANDOWNER PROTECTIONS FROM CERCLA LIABILITY
 - (1) Bona Fide Prospective Purchaser Liability Protection
 - (a) Information on the Property Acquisition
 - (i) donation
 - (ii) November 2, 2022.
 - (iii) fee simple - sole owner
 - (iv) God's Food Pantry
 - (v) The only affiliation is that God's Food Pantry has committed funds to the renovation.
 - (b) Pre-Purchase Inquiry
 - (i) A Phase I, in compliance with ASTM E1527-13 and 21, was a Phase I was performed on September 9, 2022 for OakPointe Centre.
 - (ii) Andrew Bergman with Linebach Funkhouser, Inc. Environmental Consulting firm performed the Phase I. Mr. Bergman is environmental professional per AAI standards.
 - (iii) N/A - The Phase I ESA was not conducted more than 180 days prior to the date the property was acquired.
 - (c) No disposal of hazard substances has occurred at the site since OakPointe acquired the property. OakPointe has not caused or contributed to any release of hazardous substances at the site. Oak Pointe affirms that we have not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.
 - (d) The property has not been used since being acquired.
 - (e)
 - (i) With respect to hazardous substances, no releases are occurring.
 - (ii) There will not be any disturbance of ACM or LBP to prevent any future release.
 - (iii) Limiting access to the property will prevent exposure to any previously released hazardous substance.

OakPointe Centre confirms our commitment to:

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

13. Cleanup Authority and Oversight Structure

- a. OakPointe Centre will comply with all applicable federal and state laws and will ensure that the cleanup project protects human health and the environment. OakPointe does not plan to enroll in a state response program, as ACM and LBP within a building are not subject to state oversight. OakPointe Centre's Brownfields Project Manager, Brenda Russell along with Lake Cumberland Area Development District staff will oversee and manage the overall cleanup project. Additional technical expertise and assistance will be acquired by procuring a qualified environmental professional and licensed abatement contractor(s) prior to beginning cleanup activities. OakPointe Centre's procurement will include a Request for Proposals published in the local newspaper and on our website. The responses will be thoroughly reviewed based on predetermined criterion in order to select the most qualified firm(s) and to ensure fair and open competition. Local, Women-Owned and Minority-Owned firms will be encouraged to apply.
- b. Access to adjacent properties is not anticipated in order to conduct cleanup activities, however, if it is determined that access is needed, the OakPointe Centre will work with adjacent property owners to obtain access to their properties.

14. Community Notification

- a. The draft Analysis of Brownfield Cleanup Alternatives is attached.
- b. Community Notification Ad - attached
On November 3, 2022, the OakPointe Centre published the Notice of Intent in Commonwealth Journal newspaper to inform the public of its intent to apply to the United States Environmental Protection Agency for a grant to clean up the former Palm Beach factory located at 419 Bourne Avenue in Somerset, KY. The notice informed the public of the availability of the draft grant application and ABCA for review, and invited comments on the documents.
- c. Public Meeting was conducted in-person at an ADA accessible facility on November 14, 2022. Meeting minutes, included public comments and the applicant's response, along with a roster of attendance are attached.
- d. Submission of Community Notification Documents and draft ABCA are attached.

15. Contractors and Named Subrecipients

- Contractors – N/A; a contractor has not been procured
- Subrecipients – Lake Cumberland Area Development District (LCADD) will be a subrecipient. LCADD will assist the OakPointe Centre with financial and project management. LCADD is a regional council established under state legislature (KRS Chapter 147A Section .050), and therefore, eligible for a subaward.



ANDY BESHEAR
GOVERNOR

REBECCA W. GOODMAN
SECRETARY

**ENERGY AND ENVIRONMENT CABINET
DEPARTMENT FOR ENVIRONMENTAL PROTECTION**

TONY HATTON
COMMISSIONER

300 SOWER BOULEVARD
FRANKFORT, KENTUCKY 40601
TELEPHONE: 502-564-2150
TELEFAX: 502-564-4245

November 7, 2022

Brenda Russell
Executive Director, OakPointe Centre
P.O. Box 259
Somerset, Kentucky 42502

Re: Letter of Support for a Brownfield Cleanup Grant Application

Dear Ms. Russell:

The Kentucky Department for Environmental Protection (DEP) is supportive of, and committed to, the work of OakPointe Centre to address brownfield sites in your community. DEP is the state agency charged by the legislature with the responsibility of implementing the Kentucky equivalent of the federal Superfund program, and as such, is an essential component of any attempt to systematically address brownfield redevelopment.

Supporting documentation for your project, located at 419 Bourne Ave., Somerset, KY, indicates that the cleanup involves asbestos and lead based paint. Based on a review of those surveys and the analysis of brownfield cleanup alternatives, it appears that your site is fully characterized and ready for remediation.

Asbestos and lead based paint remediation do not fall under the Division of Waste Management regulations. As such, your program does not qualify to enter Kentucky's Voluntary Environmental Cleanup Program.

Sincerely,

A handwritten signature in cursive script that reads "Eric Eisiminger".

Eric Eisiminger
Brownfield Coordinator

EE:ee

ec: Christoph Uhlenbruch, Division of Waste Management
John Rogers, Division of Waste Management, Columbia Regional Office

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