

**1. Applicant Identification:**

City of Perry, 1211 Washington Street, P.O. Box 2030, Perry, Georgia 31069

**2. Funding Requested:**

- (a) Grant Type: Single Site Cleanup
- (b) Federal Funds Requested: \$500,000

**3. Location:**

- (a) City: City of Perry
- (b) County: Houston County
- (c) State or Reservation: Georgia

**4. Property Information:**

Single Site: Stanley Assemblage, six contiguous parcels located:

Address	Parcel ID#	City	State	Zip
1119 Macon Road	0P0020 012000	City of Perry	Georgia	31069
0 Macon Road	0P0020 087000			
1107 Macon Road	0P0020 011000			
1101 Macon Road	0P0020 010000			
1102 Meeting Street	0P0020 015000			
1104 Meeting Street	0P0020 014000			

**5. Contacts:**

- (a) Project Director:  
Name: Robert Smith  
Phone: (478) 988-2757 | Email: [Robert.Smith@perry-ga.gov](mailto:Robert.Smith@perry-ga.gov)  
Mailing Address: 1211 Washington Street, P.O. Box 2030, Perry, Georgia 31069
- (b) Chief Executive/Highest Ranking Elected Official:  
Name: Mayor Randall Walker  
Phone: (478) 988-2700 | Email: [Randall.Walker@perry-ga.gov](mailto:Randall.Walker@perry-ga.gov)  
Mailing Address: 1211 Washington Street, P.O. Box 2030, Perry, Georgia 31069

**6. Population:**

City of Perry: 22,029



Where Georgia comes together.

## 7. Other Factors Checklist:

If none of the Other Factors apply to your community/proposed project, please provide a statement to that effect.

Other Factors	Page #
Community population is 10,000 or less.	
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
The priority brownfield site(s) is impacted by mine-scarred land.	
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the remediation/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation.	3, 4
The priority site(s) is adjacent to a body of water (i.e., the border of the priority site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	
The proposed site(s) is in a federally designated flood plain.	
The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	3
The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures.	
The reuse strategy or project reuse of the proposed site(s) considers climate adaption and/or mitigation measures.	
The target area(s) is located within a community in which a coal-fired power plant has recently closed (2012 or later) or is closing.	

## 8. Releasing Copies of Applications

The applicant understands that the information included will be treated in accordance with [40 CFR §2.203](#). No passages are considered confidential.

## **1. PROJECT AREA DESCRIPTION & PLANS FOR REVITALIZATION**

### **1.a. Target Area & Brownfields**

**1.a.i. Overview of Brownfield Challenges & Description of Target Area:** Founded in 1824, Perry is the county seat of Houston County, Georgia and is home to an estimated 22,029 residents within 27 square miles (US Census, 2021). Perry earned a nickname that holds true today—the crossroads of Georgia—for the two national highways that crossed the town. The importance of Perry (City) revolved around its prime location along major transportation routes (stagecoach, railways, and, later, highways). Post-Civil War, Perry was bustling with textile mills and factories. Twentieth century industrial changes started with construction of nearby Robins Air Force Base in 1941. From 1940 to 1960, Perry's population quadrupled, fueled in part by the base. Completed in the 1960s, I-75 brought a steady stream of companies to Perry's transportation thoroughfares such as Frito-Lay, Perdue Farms, and PPG Glass. The textile industry that blossomed in the early 20<sup>th</sup> century waned from the 1970s-1990s. By the mid-1990s, significant and transformative economic changes took hold. Manufacturing plants in Perry shut their doors, victims of offshore outsourcing with vastly cheaper labor and raw material costs. Perry lost well over 1,200 living wage jobs including: Textile Mill closure, 434 jobs lost (<http://www.georgia.org/competitive-advantages/workforce-division>); Northrop Grumman Corporation plant closure, 755 jobs lost (<http://cnnfn.cnn.com/1997/01/15/companies/northrop/>); and PPG Glass Plant closure, 170 jobs lost (<https://www.glassonline.com/ppg-perry-plant-closure-announced/>). Today, more than twenty years later and in a period of economic growth nationally, Perry is still struggling to rebrand and rebuild.

The closures resulted in the vacancy of hundreds of thousands of square feet of industrial space, and **nearly 30% of the workforce lost a job in a three-year time period** (Total workforce estimate (1995) 3,914; <http://censusviewer.com/City/GA/Perry>). The loss of the textile and manufacturing industries devastated the middle class and contributed to the decline of downtown Perry's commercial center, evidenced by the lack of grocery stores and other healthy food providers in the target area.

The target area for this cleanup grant is the downtown Perry district, in which the target site is centrally located; geographically defined by Houston County Census Tract (CT) 212.06. Belying its status as the City's smallest CT, it contains a large portion of its residents (2,454) and has the highest minority population (56.9%, CENSUS 2020). The target area CT is a low-income, 82th percentile EJSscreen for low-income population in comparison to the state, and a food desert with a lack of transportation options (USDA 2019).

The City prioritized the target area with community input, and the target site's environmental assessment was completed as part of its FY18 EPA grant-funded Brownfield Assessment Project. The City has worked diligently to further redevelopment efforts in and adjacent to the census tract as evidenced by the City acquiring five privately owned properties adjacent to City facilities to assemble the site. Once the cleanup is complete, this site will be shovel ready to create a public park and recreation area that will revitalize the community, remove blight, and address a Georgia Hazardous Site Inventory property plaguing the community.

**1.a.ii. Description of the Proposed Brownfield Site:** The Stanley Assemblage consists of approximately 1.4-acres across six parcels comprising a water tower and vacant land formerly improved with a shopping center and dry cleaner. Environmental assessments revealed **soil and groundwater impacted with chlorinated solvent compounds** released from the former on-premises dry cleaner.

Situated between Macon Road and Meeting Street, this assemblage is located in downtown Perry at the once heavily travelled intersection of Macon Road, which was once US Highway 41, and Commerce Street, just north of Main Street.

Historically, the assemblage supported residential dwellings from the 1930s until it was redeveloped with a thriving commercial shopping center in the 1960s, the Stanley Furniture store, a dry-cleaning facility, and a gas station. When the nearby interstate was built in the 1970s, traffic moved away from US41 that had once carried tourists from the Northeast through to Florida. In the 1970s, the gas station in the southeast corner was decommissioned and leveled to provide parking for the shopping center. The dry cleaner space on the

northeast portion was occupied between 1963 and 2011 by various tenants (One Hour Martinizing, Star Cleaners, and Fabra-Care), and performed on-premises dry-cleaning using tetrachloroethylene (PCE) between the 1960s and late 1980s.

Environmental investigations conducted by the former owner and on behalf of the City under its FY18 Assessment grant verified significant PCE impacts to the soil and groundwater throughout the assemblage. Subsequently, soil impact was verified to extend onto the neighboring Perry Event Center property, which hosts community events and public meetings. These impacts were reported to the Georgia Environmental Protection Division (EPD), and the site was subsequently listed on the state's Hazardous Site Inventory (HSI #10940) as a class II clean up priority in 2017. To facilitate source soil corrective action, the City entered the target site into the Georgia Brownfield Program in 2021. Under Georgia EPD Hazardous Waste Programs, the soil and groundwater releases are assessed and remediated independently with:

1. soil cleanup certified for compliance under EPD Brownfield Program
2. groundwater cleanup compliance completed under EPD Response and Remediation by the Responsible Party or with assistance from the Georgia Hazardous Waste Trust Fund.

Largely due to the financial limitations caused by the environmental conditions, the blighted and environmentally impaired property was exposed to vagrancy and crime in downtown Perry. The site has also been a significant safety issue as it is generally accessible and severely dilapidated. To mitigate the blighting force and immediate health hazards to the community, the City of Perry purchased the property in April 2021, abated the asbestos, and demolished the shopping center in August 2021. The approximately 1,500 cubic yards (CY) of soil impacted with PCE above residential and commercial cleanup thresholds is predominately covered with asphalt and/or building foundation to act as a temporary cap, limiting the exposure pathway to residents. Areas not covered by asphalt and building foundation were recently sodded with clean soil to further limit the potential for human exposure. The rest of the assemblage is vacant with a water tower to the north. This temporary fix is not sustainable, and without near-term action there is potential for PCE exposure to our citizens on a heavily travelled downtown corridor.

### **1.b. Revitalization of the Target Area**

**1.b.i. Reuse Strategy & Alignment with Revitalization Plans:** The City of Perry is included in the *Houston County Joint Comprehensive Plan* (Plan), which was recently updated in 2022 with significant community input. From the May 2021 kickoff, the public participation process continued with a citizen survey through July. Out of the county's 1,470 responses, 686 were from Perry residents. The plan outlined that the keys to developing a strong diverse economy include addressing blight in downtown Perry; focusing on nodal and smart growth commercial redevelopment along gateway corridors (including Main Street and Highways 127 and 341 in the target area) instead of new structures on undeveloped land; and the need for community facilities such as recreation trails and greenspace.

According to the *City of Perry Downtown Strategic Plan*, only 2% of downtown property is currently classified as green space. To address the need for more parks and recreation spaces, the Stanley assemblage is specifically mentioned in the Downtown Plan as a site for additional park space. Located next to the Perry Event Center, an event, arts and cultural activity center, the site is in a prime location for a park. As outlined in the Plan, solutions for economic needs align directly with the redevelopment of the target area and Stanley Assemblage (target site). This redevelopment will focus on safe pedestrian walkways and connectivity to recreational trails and pathways. The target site cleanup and redevelopment into a public park ties directly into this plan by creating a safe/attractive walkable connection between gateway thoroughfares into the City center, through the removal a blighted obstacle (parking lot and vacant buildings) which cut-off public walking access along Macon Road. Further, City of Perry ordinances will allow for pocket retail (such as a café), open-air farmers market, and food truck operations on the target site, furthering the ability for local businesses to reach the community in a safe, walkable destination within the downtown district.

The *City of Perry Pathways Plan* also calls for trails, sidewalks and roadway development or renovations/reconstruction across the city. The cleanup site is located in a high priority area of the plan,

which means that resources will be allocated to this area before others in different parts of the City (<https://perry.maps.arcgis.com/apps/webappviewer/index.html?id=6c2585eea69249fcb68fd6a7f686ae50>).

The **redevelopment strategy for the Stanley Assemblage (Target Site)** is to create a recreational and interactive greenspace on the former shopping center portion of the property (approximately 1.4 acres). Specifically, this redevelopment will serve as an extension of the adjoining Perry Arts Center event and educational space, with greenspace to the south, which will include an outdoor classroom space with educational and interactive signs and exhibits. This greenspace will also be location of pocket retail, including food trucks and farm stands, and outdoor event space for community plays, festivals, and music concerts. Lining the greenspace along Main Street and Macon Street will be pedestrian safe pathways, connecting the downtown center to the commercial corridor along Main Street and Highways 127 and 341, which directly aligns with the Plan. This redevelopment plan, which has significant public support and has been heavily influenced by community residents, intends to energize Perry's blighted downtown that in turn will spur the local economy with smart infill development. Further redevelopment plans are being discussed with and reviewed by community members and may include a child's play area with playground equipment, community garden, and/or a water fountain.

**1.b.ii. Outcomes & Benefits of Reuse Strategy:** The reuse of this facility will provide direct outcomes and benefits to the target area's urban disadvantaged communities and the whole City by promoting key objectives from the Plan. Key outcomes from the cleanup project include the development of a greenspace, active and passive recreation, community event space, and pocket retail. These outcomes will provide significant benefits to the local community, including the following:

- Recreational greenspace, trails, and pathways – by linking existing plans for new pathway networks providing pedestrian safe public greenspace and pathways, which is greatly desired considering the City's high rate of households without a vehicle (17.5% vs. state average 6.5%, USC, 2020).
- Farm stands providing fresh fruit and vegetables – The target site is located within a neighborhood denoted "Low Access" on the USDA Food Access Research Atlas (census tract in which at least 33% of an urban population lives farther than 1-mile from the nearest supermarket). Additionally, the need to access fresh fruit and vegetables was identified as a top priority by the community.
- Economic revitalization – The pocket retail, farm stands, and community events spaces will directly provide dozens of jobs, attract tourism and foot traffic to downtown spurring local businesses, and act as a catalyst to revitalize the downtown corridor, reducing Perry's unemployment rate (currently at 6.3% compared to 3.4% in USA, CENSUS).
- Health benefits – The removal of 1,500 CY of impacted shallow soil will remove a hazardous material from a heavily travelled corridor. PCE is a known carcinogen and causes chronic lung disease. Houston County had 57.2 deaths per 100,000 due to chronic lung disease compared to Georgia's 46.4 deaths. Removing the direct exposure pathway will improve the health and safety of our community.

Finally, the grant will support the cleanup of this vacant property and redevelopment into a civic resource to provide greenspace and transform a dreary, concrete filled downtown corridor with vegetation, community driven activity space, and revitalize an economically depressed area. As the site is currently vacant, no businesses or residences will be impacted from this redevelopment project. The City is developing plans to power the interactive components of the proposed greenspace, as well as the community arts center, through a mix of renewable energy methods, including solar powered lights.

### **1.c. Strategy for Leveraging Resources:**

**1.c.i. Resources Needed for Site Characterization:** Previously, the City utilized nearly \$100,000 of its FY18 EPA Community-wide Assessment Grant to complete the characterization of the target site, including entry into the Georgia Environmental Protection Division (EPD) state Brownfield Program. Based on this assessment, according to Georgia EPD no further site characterization is needed under the current cleanup strategy, and the site is ready for cleanup; therefore, no additional resources are anticipated for site characterization; however, should additional site

characterization be needed, the City is also applying for a FY23 EPA Brownfields Assessment Grant that could also be used for further characterization.

**1.c.ii. Resources Needed for Site Remediation:** The City is confident that the proposed EPA Cleanup grant funds will be sufficient to cover remediation costs for the 1,500 CY of impacted soil at this site. Additionally, the City has already committed \$28,059.64 of general funds for asbestos and lead-based paint remediation; \$116,360 for building demolition; and \$57,840 for site stabilization. Further, the City is currently applying for a \$500,000 FY2023 EPA Community-wide Assessment Grant that would be used for redevelopment planning at the target site. Should additional funding be necessary, the City will apply for CDBG non-entitlement funding for remediation through the Georgia Department of Community Affairs.

**1.c.iii. Resources Needed for Site Reuse:** The City is committed to using \$292,690 from its parks/capital improvement funds dedicated to the end use development. An attached commitment letter demonstrates the City's commitment to ensuring redevelopment of the target site. Should additional funding be necessary, the City will apply for a Georgia Department of Natural Resources Outdoor Stewardship grant in the 2023-2024 cycle.

**1.c.iv. Use of Existing Infrastructure:** The City is working to utilize existing infrastructure and create sustainable development opportunities within the target area. The Stanley Assemblage site adjoins an existing building (community event center), roadways, and utilities, such as power, water, sewer, and broadband, which will support/supplement the proposed redevelopment.

Downtown sidewalks are disjointed in this area, so the addition of sidewalks along this site will contribute greatly to walkability in the target area. Currently, Perry is working with the Georgia Department of Transportation to access funding for streetscape and road improvements in the target area that will improve site access and connectivity.

## **2. COMMUNITY NEED & COMMUNITY ENGAGEMENT**

### **2.a. Community Need**

**2.a.i. The Community's Need for Funding:** Due to the existing economic limitations of the low-income and a small population, the City has limited discretionary resources to implement remediation and reuse projects without this EPA grant. Expected City revenues in FY22 were approximately \$159,600 less than expenditures due to increasing rates of interest on debt and inflation. Given the extent of environmental impacts, EPA funding will allow the City to remediate over 1,500 CY of hazardous soil and complete reuse planning that would not otherwise be possible. The City has already expended significant resources, \$202,260, to address immediate health threats posed by the blighted property through property acquisition, abating asbestos, and demolishing the deteriorated shopping center.

The City's median household income is only \$56,389 (vs. \$61,224 in the state), and 26% of households have a median income below \$25,000 (2020 US Census), 5 year estimate (CENSUS)). The site Census Tract (CT) is a low-income as it falls in the **82<sup>th</sup> percentile for low-income population in comparison to the state (EJScreen)**. The City's high rate of households without a vehicle compounds this hardship (17.5% vs. the state average of 6.5%, CENSUS).

Without EPA assistance with the considerable cost to complete soil remediation, the City will struggle to transition the target property from vacant unused land into a valued community resource for jobs, recreation, retail, and improved community aesthetics that will further attract retailers and service providers to the target area. Ultimately, the grant funds will transform this site into a safe, centrally located, communal greenspace and food truck/farm stand venue that encourages redevelopment in downtown Perry.

### **2.a.ii. Threats to Sensitive Populations:**

**2.a.ii(1) Health or Welfare of Sensitive Populations:** The City of Perry and our target area are home to several sensitive populations, including: children (23%); disabled (11.5%); families living below the poverty line (11.6%); and minority residents (mainly African American at 33.5%; CENSUS). The CT 212.06 target area's populations for ages under 5 and over 64 are listed in the EJ Screen Demographic Indicators in 92<sup>nd</sup> and 64<sup>th</sup> percentiles, respectively, in comparison to the state. Additionally, the low-income population in the target

area is in the 84<sup>th</sup> percentile when compared to the state (*EJScreen*). African American residents in CT 212.06 are nearly three times more likely to live in poverty as compared to white residents and have a \$35,755 household income, which is significantly lower than the rest of the City (\$56,389) and state (\$61,244) (*CENSUS*).

Residents in the target area are exposed to a variety of dangerous constituents, especially citizens located in single-family residences and a multi-family apartment complex located north of the community arts center, less than 200 feet away from documented soil and groundwater impacts. Without near-term corrective action contaminated soils containing dry-cleaning compounds may continue to leach into the water table resulting in increased groundwater concentrations or eventually migrate onto neighboring properties via dust or stormwater runoff.

Given the blighted and unsecured state of the target site at the time of acquisition, efforts to keep out trespassers and criminal activity were futile. Immediate health concerns from the known asbestos and lead-based paint impacts and the overall dilapidated condition of the commercial structure led the City to abate asbestos/lead and demolish the structure with its own general funds. Unfortunately, the target site in its current form remains open to the public, with the asphalt parking lot, the former concrete foundation, and recently placed sod acting as a temporary barrier over the heavily impacted soil. By redeveloping the Stanley Assemblage site in the target area, known environmental impacts that affect the health of our citizens will be cleaned up, and the risk of exposure will be reduced when the contaminated soils (source material) are excavated and disposed of properly. The target property is situated in an ideal location to provide a venue for farmers markets and food stalls, which would directly improve access to food in an area of Downtown Perry that lacks grocery stores and other healthy food providers.

**2.a.ii(2) Greater Than Normal Incidence of Disease & Adverse Health Conditions:** As noted above, sensitive populations are more susceptible to the risks of exposure to environmental contamination suspected at the Stanley Assemblage site. The known PCE plume in soil and groundwater has the potential to further migrate into this residential area and nearby commercial business to the west and south, causing respiratory issues and cancer from prolonged vapor intrusion exposure to volatile organic compounds.

Area health data is only available at the county level: in Houston County, 15.4% (6.5% higher than Georgia overall) of adults and 9.5% of children are affected by asthma, and another 10% have been diagnosed with COPD (2020 Community Health Needs Assessment). In the 2021 Houston County Community Health Needs Assessment, the annual average death rate per 100,000 persons for Chronic Lung Disease was significantly higher in Houston than in the state and US; 57.2 for Houston as compared to 46.4 in Georgia and 40.4 in the US. People with these respiratory diseases are especially sensitive to poor air quality and are disproportionately affected by airborne contaminants, such as asbestos from deteriorating building materials and VOC-contaminated dust originating from the Stanley Assemblage. Asbestos and dry-cleaning solvents (such as PCE) are **known carcinogens**. Prior to the City abating asbestos, area residents may have been exposed to fugitive fibers from deteriorating asbestos-containing materials. Further, residents can be exposed to PCE through inhalation of vapors from migrating groundwater, or by direct contact with contaminated soils since the site is unsecured and only partially paved ([atsdr.cdc.gov](https://www.atsdr.cdc.gov)). Prior to the City's abatement, asbestos on the site was also a factor contributing to lung disease. The annual average death rate per 100,000 persons in Houston with lung cancer is 42.6 vs. 39.0 in the state and 36.6 in the US (2021 Houston County Community Health Needs Assessment). The 2021 Houston County Health Needs Assessment states that Houston County is the second leading county in middle GA with COVID-19 cases. Like many cities in Georgia, Perry was affected by COVID-19 and with a population consisting of 36% African Americans, a group more highly affected by the virus, the City was greatly affected by the impacts of the pandemic (CDC). The redevelopment of a now vacant property (target site) will increase the overall quality of life for surrounding sensitive populations.



**2.a.ii(3) Promoting Environmental Justice:** The 1-mile radius around the Stanley Assemblage have the following EJ Index percentiles in comparison to the USA and Georgia:

Comparison	PM 2.5	Air Cancer Risk	Respiratory HI	Lead Paint Indicator	Superfund Proximity
USA	70	80	83	73	69
Georgia	43	70	71	76	76

As indicated by EPA EJ Screen, the Stanley Assemblage site and overall target area are in an area with greater environmental risk for cancer, respiratory health problems, and particulate dust, which indicates an environmental impact to the City. This grant will help the community cleanup and achieve what we would otherwise struggle to accomplish due to limited financial resources. Cleanup of the Stanley Assemblage site will be one step of many the City of Perry can take to begin to correct for decades-long environmental injustices disproportionately endured by the African American population. Over the past 40+ years, these community members have (and continue to):

- bear a disproportionate burden of exposure to harmful contaminants compared to other City residents;
- experienced a disproportionate amount of negative health issues and outcomes as compared to their white counterparts in Perry;
- endured a significantly lower quality of life than other Perry residents;
- enjoyed significantly less access to quality open spaces, trails, and recreational amenities than other Perry residents; and
- had little access to retail outlets, jobs, and economic opportunity as their neighborhood has faced decades of disinvestment and isolation associated with brownfield conditions of the Stanley Assemblage site.

Encouraging the reuse of the site, as outlined in our comprehensive plan, will attract new commercial developments to facilitate local job growth, increase access to safe walkable trails and greenspace, promote healthier communities, and access to fresh produce (farmers market). Moreover, the outcomes of this project would facilitate the abatement or mitigation of known and contributing factors currently present on a brownfield property and facilitate redevelopment that would have positive benefits and create a means for the City to address these disparities. Through the City's public participation process, this environmentally challenged community will be able to directly participate cleanup and reuse planning.

## **2.b. Community Engagement**

**2.b.i-ii. Project Involvement and Project Roles:** The City of Perry has successfully engaged the community through recent planning events like the Houston County 2022 Comprehensive Plan Update and its FY18 EPA Brownfields Assessment Grant. The City will build off existing community involvement efforts. Project partners will facilitate community involvement in the brownfields project as described below. Perry is a small rural community with limited numbers of available local partners. However, the City has been able to foster significant support, regardless of perceived limited resources, through communication with schools, non-profits, and word of mouth. Below are community organizations that have made firm commitments to planning and implementation of the EPA Brownfields Cleanup Grant:

Community Based Organization	Contact Information	Role
Faith Bible Fellowship	Willie King, Pastor & Councilmember Willie.king@perry-ga.gov	Outreach to African American Community in the Target Area, Provide Meeting Space, Steering Committee Service.
Central Georgia Technical College	Andrea Griner, VP for ED agriner@centralgatech.edu	Workforce Training Partner
Perry Main Street Advisory Board	Alicia Hartley, Downtown Manager alicia.hartley@perry-ga.gov	Promotion, marketing, and redevelopment of the targeted corridor.



Perry Downtown Development Authority		Marketing, outreach, and information dissemination to Downtown District Steering Committee Service.
Habitat for Humanity	Bill Goggins, Executive Director hocohabitat@att.net	Will commit to service on steering committee
Perry Chamber of Commerce	Maggie Schuyler, President maggie@perrygachamber.com	Moving into project area, Meeting Space & Outreach
Tabitha Clark	tabitha.clark@perry-ga.gov	Communications Manager

**2.b.iii. Incorporating Community Input:** The City will build on its existing community involvement activities to communicate progress and solicit input on cleanup/reuse plans. The current community involvement plans are designed to explain and communicate project activities to the whole target community and interested parties. While COVID-19 has changed the way community input occurs, it has not stalled resident engagement. Specific to the target site, the City met with residents of the immediate neighborhood to the north, commercial business owners, the community center, and the Main Street Advisory Board, all through a series of Zoom meetings. The City has held three in-person public meetings over the last 12 months with the most recent meeting held to discuss this proposal on Wednesday, November 2, 2022. Prior community meetings associated with the City's FY18 EPA Community Wide Assessment grant discussed this project, and the meetings were covered by local news outlets who published online articles and broadcast television stories spotlighting the proposed cleanup and application for EPA Cleanup grant funding. Moving forward, the City will display meeting notices on the LED board outside of City Hall approximately 0.15 miles northwest of the target site. Info will also be emailed, announced at neighborhood meetings, and updated on the City website and social media platforms (Facebook & Twitter) in English and Spanish. The City will use their committed partners and a variety of media (mailings, postings at transit stops, social media) to engage the local community in the Target Area throughout the grant cycle. If the community experiences high volumes of people affected by COVID-19, public health safety protocols will be implemented, such as virtual meetings conducted via Zoom. Prior to conducting cleanup activities, the City will host a community-wide forum where residents and stakeholders will have the opportunity to learn about proposed cleanup plans and provide comment and input on the final cleanup decisions. Four community meetings/charrettes are planned for the project. The City will evaluate all suggestions and will respond to the input.

### **3. TASK DESCRIPTIONS, COST ESTIMATES, & MEASURING PROGRESS:**

**3.a. Proposed Cleanup Plan:** A draft Analysis of Brownfield Cleanup Alternatives (ABCA) was completed in October 2022. The document summarized the findings of assessment work completed and presented three environmental cleanup alternatives for each of the recognized environmental concerns identified. The facility is also listed in the Georgia Brownfields program with an approved Prospective Purchasers Corrective Action Plan (PPCAP), which verifies the site is ready for cleanup. In summary, the following issues were identified with the appropriate cleanup plan selected based on cleanup standard and intended reuse.

**Soil Contamination (PCE):** Given the potential to impact human health and the environment, the selected alternative is excavation, proper disposal (at a Subtitle D landfill) of 1,500 CY of impacted soil, and backfilling and compacting with clean soil. At this time, PCE impacts are primarily located in the upper 3 feet, in an area around the former dry cleaners and extending north onto the Perry Arts Center and water tower areas, with deeper impacts (0-15') at the northwest portion of the former dry cleaners. Confirmatory sampling will be conducted in accordance with state cleanup guidelines to document cleanup compliance with the vertical and horizontal extents of excavated soil. The impacted soil will be excavated; profiled as a documented waste stream; and transported off-site for proper disposal at the approved landfill. If impacts are encountered at depths greater than anticipated based on assessment results, then additional soil excavation may be required to achieve unconditional closure status. To profile for proper disposal, a toxicity

characteristic leachate procedure (TCLP) VOC test will be performed on all soil, asphalt parking, and concrete building slab waste removed from the site.

**Groundwater Contamination (PCE):** Under the Georgia Hazardous Site Response Act O.C.G.A. § 12-8-96, *et seq.*, as amended, and Rules for Hazardous Site Response, Chapter 391-3-19; a Responsible Party has been identified (former site owner) and is obligated to resolve the groundwater contamination. If the Responsible Party defaults on cleanup responsibilities, then groundwater cleanup will fall under the purview of the Georgia Hazardous Waste Trust Fund. Further, the target site is currently enrolled in the Georgia Brownfields program, which will certify compliance with soil cleanup independent of dissolved groundwater impacts and offers limitation of liability from dissolved phase groundwater impacts to the current owner, the City of Perry. Therefore, no groundwater remediation is necessary under this project.

### 3.b. Description of Tasks/Activities & Outputs:

<b>Task/Activity 1: Programmatic Support</b>
i. <i>Project Implementation EPA Funded Activities:</i> Cooperative agreement oversight; budget management, scheduling and coordinating of subcontractors, monthly team meetings (Qualified Environmental Professional (QEP)/City); quarterly and annual reporting to EPA; ACRES entries; final report and closeout documentation; annual reporting; Davis-Bacon & Historic Preservation; City staff travel to conferences, workshops for purposes of staff development and improvement of project efficiencies <i>Non-EPA grant resources needed:</i> Oversight by Project Director (Robert Smith) and City staff
ii. <i>Anticipated Project Schedule:</i> Pre-award through closeout in Month 15; kick-off meeting in Month 1 (October 2023); monthly status meetings (Months 1-15); quarterly reports (Months 4, 7, 10, 13, 15); closeout report in Month 15
iii. <i>Task/Activity Lead (s):</i> Project Director with support from QEP and project staff
iv. <i>Output(s):</i> 6 quarterly reports, ACRES data entry; 15 monthly team meeting notes; close-out report
<b>Task/Activity 2: Community Involvement</b>
i. <i>Project Implementation EPA Funded Activities:</i> completion of CIP, community meetings/charrettes to provide updates and solicit input from Target Area community on cleanup process/progress; preparation of Stanley Assemblage Brownfield Brochures <i>Non-EPA grant resources needed:</i> in-kind resources including project team staff effort and efforts of community partners who will host and promote participation of community members
ii. <i>Anticipated Project Schedule:</i> Pre-award through closeout in Month 15; the CIP and Brochure will be created in the first month. The first community meetings/design charrettes are planned during months 0-3, with the remaining three meetings/charrettes during Months 3-15.
iii. <i>Task/Activity Lead(s):</i> Public Outreach Communications Manager with support from the Project Director the QEP and project staff
iv. <i>Output(s):</i> 1 CIP; 200 copies of Stanley Assemblage Brownfield Brochure; 4 community meetings/charrettes with response to comments/documentation
<b>Task/Activity 3: Cleanup &amp; Reuse Planning</b>
i. <i>Project Implementation EPA Funded Activities:</i> Final ABCA; Development of QAPP and HASP; Compliance Status Report (CSR) for EPD Brownfield review/approval. Reuse Planning: Revisions to existing site plan to incorporate additional community feedback and to ensure community benefit. <i>Non-EPA grant resources needed:</i> Project Director/City staff oversight and coordination with GA EPD
ii. <i>Anticipated Project Schedule:</i> <i>Cleanup Planning:</i> Months 1-4 (ABCA will be subject to public input); <i>Reuse Planning:</i> Months 1-15
iii. <i>Task/Activity Lead(s):</i> QEP with oversight by the City project director and technical director

<i>iv. Output(s): Cleanup Planning: 1 Final ABCA; 1 QAPP and HASP; CSR for Brownfield Program; Reuse Planning: Revised site plans per environmental and community input considerations</i>
<b>Task/Activity 4: Cleanup Activities</b>
<i>Project Implementation EPA-funded activities: Soil excavation, confirmatory sampling; disposal at Subtitle D landfill; soil backfill; compliance reporting.</i>
<i>Non-EPA grant resources needed: Project Director/City staff oversight</i>
<i>ii. Anticipated Project Schedule: Months 2-5 soil excavations, disposal, and backfilling</i>
<i>iii. Task/Activity Lead(s): Project Director with assistance from QEP</i>
<i>iv. Output(s): Removal of approximately 1,500 CY of soil impacted with PCE</i>

### 3.c. Cost Estimates:

Budget Categories		Project Tasks (\$)				Total
		Task 1	Task 2	Task 3	Task 4	
		Programmatic Support	Community Involvement	Cleanup & Reuse Planning	Cleanup Activities	
Direct Cost	Travel	\$5,000	\$0	\$0	\$0	\$5,000
	Supplies	\$0	\$5,000	\$0	\$0	\$5,000
	Contractual	\$20,000	\$20,000	\$75,000	\$375,000	\$490,000
<b>Total Budget</b>		<b>\$25,000</b>	<b>\$25,000</b>	<b>\$75,000</b>	<b>\$375,000</b>	<b>\$500,000</b>

(Notes: Personnel, Fringe Benefits, Equipment, Other, and Indirect Costs not shown as amounts are zero)

**Task 1: Programmatic Support:** \$5,000 for travel to two EPA National Brownfields conferences and/or regional brownfields events for one City staff member (includes approximate costs of \$800 in registration fees, \$2,000 for 8 nights @ \$250/night in the conference hotel(s), \$1,200 airfare for 2 round trip tickets, \$400 ground transportation/parking and \$600 per diem expenses for 8 days @ \$75 per day). \$20,000 contractual support is also allocated to this task for the QEP to support City staff in drafting reports, updating EPA ACRES, scheduling meetings, Davis Bacon Act and Historic Preservation reporting, and overall project management activities (\$125 per hour for 160 hours over the project period) **Total: \$25,000**

**Task 2: Community Involvement:** One Community Involvement Plan (CIP) \$4,000 (\$125 per hour for 32) hours of work; four community engagement meetings with contractual support in reuse planning and delivery at \$16,000 (\$125 per hour for 128 hours of work over the project period). City outreach and public information supplies: \$2,500- renderings/conceptual drawings/story boards designed/printed; \$1,700 marketing materials, such as brochures/flyers, posters; \$800 public notices for four meetings: \$5,000. **Total: \$25,000**

**Task 3: Cleanup & Reuse Planning:** Final ABCA \$5,000 (40 hrs @ \$125); QAPP and HASP will be created by the QEP for \$10,000 (80 hrs @ \$125); CSR for Georgia EPD Brownfield \$15,000 (120 hrs @ \$125). Reuse Planning: Updated site plans, including engineering considerations, will be produced for an estimated cost of \$45,000 (280 hrs @ \$125). **Total: \$75,000**

**Task 4: Cleanup Activities: Soil Remediation – Design and Subcontract Bidding:** \$15,000 (120 hrs @ \$125); *Site Preparation* (permitting, erosion and sediment control measures, utility locate, etc.): \$10,000 (80 hrs @ \$125); *Soil Remediation:* \$315,000 - Excavation, disposal, and backfilling of approximately 1,500 CY (@ \$210/CY) of soil, concrete, and asphalt; two weeks excavation crew on-site @ \$10,000/week (crew and equipment rate); *Project Oversight and Confirmation Sampling:* \$25,000 (10 days @ \$2,500/day for personnel hours @ \$125, per diem, and rush analytical sampling). **Total: \$375,000.**

**3.d. Measuring Environmental Results:** The Project Director with support from key staff and the QEP will document, track, and evaluate the following outputs and outcomes continually through quarterly progress reports, annual disadvantaged business enterprise reporting, and in monthly calls with the EPA Project Officer. These monthly meetings will allow the Project Director to track progress, ensure the project remains

on schedule, and take corrective measures if needed. The activities and outcomes will be tracked through an Excel project management spreadsheet, invoice management system, through EPA ACRES, and documented in a final closeout report. Outputs: CIP, Brownfields Brochure, final ABCA, cleanup design, selection of remedial contractors, completion of soil excavation, compliance reports, and overall cleanup completion report. Outcomes: Acres of land redeveloped and community benefit from public greenspace positioned for adaptive reuse; amount of private investment and other funding leveraged; jobs created or retained; increased property and sales tax revenue generated. An overall gauge of success will be acres of land redeveloped, the creation of temporary jobs during cleanup and improvements in environmental justice concerns (reduction of blight, access to greenspace and food stands, and removal of contaminants from environment). Most importantly, the cleanup and redevelopment of the Stanley Assemblage as a public space will serve to further improve the City of Perry's downtown by providing a venue for all to enjoy.

#### **4. PROGRAMMATIC CAPABILITY & PAST PERFORMANCE**

##### **4.a. Programmatic Capability**

**4.a.i-ii. Organizational Structure and Description of Key Staff:** The City of Perry has the internal capability to manage all technical and administrative aspects of the subject grant. Robert Smith, the City of Perry's Assistant City Manager will serve as Project Director. Mr. Smith has eight years' experience in municipal government and holds a Master's degree in Public Administration. He has successfully administered a wide array of local, state, and federal grants including CDBG grants, EDA grants, and DNR grants. As manager of the Department of Economic Development for the City of Perry, Robert works with Mayor and Council which includes oversight of the Perry Main Street Advisory Board and associated Perry Downtown Development Authority. Mr. Smith will be assisted by Ansley Fitzner, Public Works Superintendent, who will serve as Project Coordinator. Mr. Smith will also serve as the Financial Director, ensuring compliance with all terms and conditions and financial obligations under this grant. In addition, the City will dedicate an on-staff communications manager to the project. Ms. Fitzner will serve as Public Outreach Communications Manager and will be responsible for successful implementation of the City's formal CIP, program materials, newsletters and media updates.

**4.a.iii. Acquiring Additional Resources:** The City will select a QEP for this cleanup grant project through a fair and open bid process, fully consistent with federal procurement requirements 2 CFR 200 and EPA's Rule 2 CFR 1500. We will select a QEP with experience in Brownfield Cleanup project implementation who will be responsible for selecting remediation contractors through a process in compliance with federal procurement rules. The City has formal systems in place to replace critical staff and hire additional contractors, if needed.

##### **4.b. Past Performance & Accomplishments:**

###### **4.b.i. Currently Has or Previously Received an EPA Brownfields Grant:**

(1) Accomplishments: The City received a FY2018 EPA Assessment Grant. The City project team who achieved the results outlined in the table below remain the same. These accomplishments have been recorded in the EPA ACRES Database.

Agency	Program	Amount	Date	Grant Accomplishments
US EPA	Brownfields Assessment	\$300,000	2018	8 Phase I ESAs, marketing materials; 8 asbestos surveys, and 9 Phase II ESAs

(2) Compliance with Grant Requirements: The City complied with work plans, schedules, terms and conditions for the FY18 grant. Quarterly reports and deliverables were submitted to EPA and entered into ACRES in a timely fashion. All terms/conditions have been met. **Grant was successfully closed with all but approximately \$6,092.49 in funds remaining due to Covid-related travel restrictions and programmatic savings.**

## **Threshold Response**

**1. APPLICANT ELIGIBILITY:**

The City of Perry, Georgia is eligible to apply for an EPA Brownfields Cleanup Grant as a local government as defined under 2 CFR 200.64.

**2. PREVIOUSLY AWARDED CLEANUP GRANTS:**

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

**3. Expenditure of Existing Multipurpose Grant Funds:**

The City of Perry nor the Stanley Assemblage priority site have received funding from a previously awarded EPA Multipurpose Grant.

**4. SITE OWNERSHIP:**

The City of Perry affirms that it is the sole owner of the priority site as of February 12, 2021. This site is the subject of this cleanup grant proposal. The City further affirms that it will retain ownership of the site throughout the three-year period of performance of the grant, if awarded.

**5. BASIC SITE INFORMATION:**

a. Site Name: Stanley Assemblage

b. Site Address:

Street Address	Parcel Number	City	State	Zip Code	Site Owner
0 Macon Road	0P0020 087000	Perry	Georgia	31069	City of Perry
1101 Macon Road	0P0020 010000	Perry	Georgia	31069	City of Perry
1107 Macon Road	0P0020 011000	Perry	Georgia	31069	City of Perry
1119 Macon Road	0P0020 012000	Perry	Georgia	31069	City of Perry
1102 Meeting Street	0P0020 015000	Perry	Georgia	31069	City of Perry
1104 Meeting Street	0P0020 014000	Perry	Georgia	31069	City of Perry

c. Current Owner – City of Perry.

**6. STATUS AND HISTORY OF CONTAMINATION AT THE SITE:**

a. This site is contaminated by hazardous substances

b. The Stanley Assemblage historically supported residential dwellings from the 1930s until it was redeveloped with a commercial shopping center in the 1960s, which included the Stanley Furniture store, a dry-cleaning facility, and a gas station. The site also supports a city supply water tower northwest of the former shopping center that was developed in the 1960s. The gas station in the southeast corner was decommissioned in the 1970s and leveled to provide parking for the shopping center. The dry cleaner space on the northeast portion was occupied between 1963 and 2011 by various tenants (One Hour Martinizing, Star Cleaners, and Fabra Care), and performed on-premise dry-cleaning using tetrachloroethylene (PCE) between the 1960s and late 1980s. The shopping center was vacant since the mid-2010s and left to deteriorate. The City acquired it in April 2021, and due to safety concerns abated asbestos containing materials and demolished the commercial shopping center structure in August 2021. The former dry cleaning building foundation and adjacent asphalt parking lot remains to act as a temporary barrier over the contaminated soil, and additional areas were sodded over.

c. Environmental concerns known at the site are PCE impacts to the soil and groundwater throughout the assemblage, with the potential for contaminant migration via groundwater onto off-site properties. Additionally, the soil impacts are verified to extend onto the neighboring city-owned Arts Center property.

d. The site was contaminated through the use of PCE dry-cleaning solvents from the former dry cleaner on the northeast portion of the shopping center, which operated from the 1960s until the late 1980s. An estimated 1,500 cubic yards (CY) of PCE impacted soil has been delineated in the upper 3 feet of soil in an area around the former dry cleaners, with deeper impacts (0-15') at the northwest portion of the former dry cleaners. Groundwater was identified with concentrations of PCE above EPA safe drinking water standards and Georgia Media Target Concentrations (MTCs) in the three on-site shallow monitoring wells, with potential for additional impacts further downgradient, upgradient, and in deep water aquifers.

#### **7. BROWNFIELDS SITE DEFINITION:**

The City of Perry affirms that the site is: (a) not listed or proposed for listing on the National Priorities List; (b) not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA; and (c) not subject to the jurisdiction, custody, or control of the United States government.

#### **8. ENVIRONMENTAL ASSESSMENT REQUIRED FOR CLEANUP GRANT APPLICATIONS:**

A Phase II Environmental Site Assessment (ESA) was conducted at the site in accordance with American Society of Testing and Materials ASTM E1903-19 and the final report was completed on October 22, 2019, by Cardno, Inc. (Cardno). Additional investigations were conducted by Cardno in accordance with ASTM E1903-19 to further delineate the identified impacts, including a Groundwater Sampling Phase II ESA Addendum #1 dated January 11, 2020 and additional soil delineation sampling September 2021. A Prospective Purchaser's Corrective Action Plan was prepared in January 2021 (revised on April 22, 2021) for the site to address soil impacts and submitted to Georgia Environmental Protection Division Brownfield Program.

#### **9. SITE CHARACTERIZATION:**

- a. Not applicable, the applicant is not a State or Tribal Environmental Authority.
- b. Site is currently enrolled in the Georgia Environmental Protection Division (EPD) Brownfield Program. The Brownfield Program is a voluntary remediation program that oversees cleanup (excluding groundwater) of environmentally impaired properties and provides limitation of liability related to dissolved phase groundwater impacts. Entry into this program requires the development of a Prospective Purchaser's Corrective Action Plan (PPCAP) that specifies the planned corrective action process. A letter is attached from the Georgia EPD Brownfield Program affirming the Site is enrolled in the program and has been adequately characterized for soil cleanup.

It should be noted EPD Brownfield will certify soil cleanup compliance on the target site independent from the resolution of the groundwater release. The Georgia EPD letter additionally acknowledges the City is only responsible for soil cleanup.



The target site is listed in the Georgia EPD Hazardous Site Inventory (HSI) for the aforementioned groundwater impacts. The EPD HSI is managed by the Georgia EPD Response and Remediation Program (RRP) who provide oversight for assessment and/or corrective action required to bring groundwater impacts into compliance. Specific to the target site, Georgia EPD RRP identified the Responsibility Party (RP), the previous owner, who will be responsible for addressing groundwater characterization and cleanup. If the owner is not capable or defaults on requirements to address groundwater, the State's Hazardous Waste Trust Fund will be used to bring groundwater into compliance with EPD regulations.

- c. Not applicable, the target site is eligible and currently enrolled in the Georgia EPD Brownfield Program, a voluntary response program with environmental oversight.

**10. ENFORCEMENT OR OTHER ACTIONS:**

There are no current environmental enforcement or other actions related to the Brownfield site for which funding is sought. The City of Perry is not aware of any current inquiries, or orders from federal, state, or local government entities regarding the responsibility of any party (including the City of Perry) for the contamination, or hazardous substances at the site, including any liens.

The Site is listed in the Georgia EPD HSI and is currently managed by the Georgia EPD RRP. The RRP identified the responsibility party (RP), the previous owner who oversaw the property during dry-cleaning operations, who will be responsible for addressing groundwater characterization and cleanup. The City of Perry will not be held responsible for groundwater cleanup. There are no current enforcement or other actions at this time with the previous owner; however, it is possible for future enforcement actions related to groundwater impacts that would require the previous owner and/or Georgia EPD to access the Site to further characterize and address groundwater contamination. The City of Perry acknowledges the potential for future enforcement and will work with the former owner and/or Georgia EPD as needed. A letter from Georgia EPD Brownfields stating that the City is not responsible for groundwater cleanup is provided.

**11. SITES REQUIRING A PROPERTY-SPECIFIC DETERMINATION:**

The subject site does not require a property-specific determination in order to be eligible for funding.

**12. THRESHOLD CRITERIA RELATED TO CERCLA/PETROLEUM LIABILITY:**

- a. **Property Ownership Eligibility – Hazardous Substance Site:** The City of Perry acquired the six parcels comprising the assemblage via two separate property transfers, which qualify for eligibility under separate CERCLA sections. Property acquisition details are summarized in the table on the following page and provided in detail in the following threshold criteria responses.

Street Address	Parcel Number	Acquisition Method	Acquisition Date	Previous Owner
0 Macon Road	0P0020 087000	Fee Simple Sale	2/12/2021	Mr. Perry Stanley

Street Address	Parcel Number	Acquisition Method	Acquisition Date	Previous Owner
1101 Macon Road	0P0020 010000	Fee Simple Sale	2/12/2021	Mr. Perry Stanley
1107 Macon Road	0P0020 011000	Fee Simple Sale	2/12/2021	Mr. Perry Stanley
1119 Macon Road	0P0020 012000	Unknown	Prior to 1/11/2002	Unknown
1102 Meeting Street	0P0020 015000	Fee Simple Sale	2/12/2021	Mr. Perry Stanley
1104 Meeting Street	0P0020 014000	Fee Simple Sale	2/12/2021	Mr. Perry Stanley

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

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

The City of Perry owned property at 1119 Macon Road (Parcel ID# 0P0020 012000) was acquired prior to January 11, 2002.

**iii. LANDOWNER LIABILITY PROTECTIONS FROM CERCLA LIABILITY**

**(1) Bona Fide Prospective Purchaser Liability Protection**

The City of Perry acquired the remaining parcels via fee simple sale on February 12, 2021, and is not potentially liable for contamination at the site as a bona fide prospective purchaser (BFPP).

**(a) Information on the Property Acquisition**

- i. The City of Perry acquired ownership by the negotiated purchase from a private individual
- ii. The City of Perry acquired the purchased parcels on February 12, 2021
- iii. The City of Perry has fee simple title for the property.
- iv. The City of Perry acquired the property from Mr. Perry Stanley
- v. The City of Perry has no familial, contractual, corporate, or financial relationships or affiliations with the prior owners or operations (or other potentially responsible parties) of the property.

**(b) Pre-Purchase Inquiry Describe any inquiry by you or others into the previous ownership, uses of the property, and environmental conditions conducted prior to taking ownership. Please include the items below in your description.**

- (i) An ASTM E1527-13 Phase I Environmental Site Assessment (ESA) dated January 28, 2019, was performed on the City of Perry, with an update report completed on December 18, 2020. The Phase I ESA and update was performed on behalf of the City of Perry under the City's FY2018 EPA Brownfields Assessment Grant.
- (ii) Douglas Strait, PE, Project Manager, Cardno, performed the Phase I ESA. His qualifications to perform such work are shown in the Phase I ESA Report "Qualification/signatures of Environmental Professional(s)".
- (iii) The original AAI investigation or Phase I environmental site assessment was conducted more than 180 days prior to the date the City of Perry acquired the property. An update to the original Phase I ESA was completed on December 18, 2020 (within 180 days prior to acquisition of the property) to include interviews with past and present owners, operators and occupants; searches for recorded environmental cleanup liens; review of federal state and local government records; visual inspection of the

property and adjoining properties; and the declaration by the environmental professional.

(c) Timing and/or Contribution Toward Hazardous Substances Disposal

The City of Perry affirms all disposal of hazardous substances at the site occurred before it acquired the property and further that the City of Perry neither caused nor contributed to any release of hazardous substances at the site. The City of Perry 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

(d) Post-Acquisition Uses

Since the City of Perry acquired ownership, through the present, the property has remained vacant and not in use. In August 2021, the City demolished the commercial structure, and the lot is currently vacant.

(e) Continuing Obligations

The City of Perry has exercised the following specific appropriate care with respect to hazardous substances found at the site by taking reasonable steps to:

- i.) stop any continuing releases. There are no continuing releases from the site and there were none at the time of property acquisition. Dry cleaning operations stopped in the late 1980s with the closure of the business. No commercial activities are ongoing at this site that would generate additional contamination
- ii.) prevent any threatened future release. A future release is not threatened as contamination has been adequately delineated in the soil
- iii) prevent or limit exposure to any previously released hazardous substance. City of Perry has stabilized and covered impacted soils on the site with clean fill or asphalt and concrete

The City of Perry confirms its 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

**b. Property Ownership Eligibility – Petroleum Sites**

**i. INFORMATION REQUIRED FOR PETROLEUM SITE ELIGIBILITY DETERMINATION**

A gasoline filling station formerly operated on parcel at 1101 Macon Street (tax parcel ID#0P0020 010000). The State of Georgia does not provide petroleum determination letters. The following parcels were deemed eligible for hazardous and

petroleum constituents by EPA Project Officer Olga Perry on February 14, 2019:  
0P0020 010000 0P0020 087000, 0P0020 011000, 0P0020 015000, 0P0020 014000.

**Eligibility form attached**

(1) Current and Immediate Past Owners

The Current Owner is the City of Perry. The immediate past owner is Mr. Perry Stanley.

(2) Acquisition of the Site

The current owner acquired the property through a negotiated purchase of \$75,000 along with parcels: 0P0020 087000, 0P0020 011000, 0P0020 015000, 0P0020 014000.

(3) No Responsible Party of the Site

The current and immediate owners have

- (i) Not dispensed or disposed of petroleum or petroleum product contamination, or exacerbated the existing petroleum contamination at the site;
- (ii) Not owned the site when any dispensing or disposal of petroleum (by others) took place; and
- (iii) Taken reasonable steps with regard to the contamination at the site.

(4) Cleanup Up by a Person Not Potentially Liable

The City of Perry have not dispensed or disposed of petroleum or petroleum product, or exacerbated the existing petroleum contamination at the site, and took reasonable steps with regard to the contamination at the site.

(5) Judgement, Orders, or Third-Party Suite

No responsible party, including the City of Perry, is identified for the site through (a) judgement rendered in a court of law or an administrative order that would require any person to assess, investigate, or cleanup the site; (b) an enforcement action by federal or state authorities against any party that would require any person to assess, investigate, or cleanup the site; or (c) a citizen suite, contribution action, or other third-party claim brought against the current or immediate past owner, that would, if successful, require the assessment, investigation, or cleanup of the site.

(6) Subject to RCRA

The site is not subject to any order under §9003(h) of the Solid Waste Disposal Act

(7) Financial Viability of Responsible Parties

No responsible party has been identified.

**13. CLEANUP AUTHORITY AND OVERSIGHT STRUCTURE:**

- a. The non-petroleum soil cleanup at the site will be remediated under authority of the Georgia Hazardous Site Reuse and Redevelopment Act – Amended 2002, and the Brownfields Tax Incentive Law - Enacted 2003. Any petroleum soil and groundwater impacts will be managed by the Georgia Underground Storage Tank Management Program (USTMP), Enacted 1988. The City of Perry will contract for the services of a qualified engineering firm experienced in Brownfields redevelopment to perform cleanup oversight activities and related services. The selected firm will be procured in full compliance with the federal procurement provisions of 2 CFR 200.317 through 200.326. A draft Analysis of

Brownfields Cleanup Alternatives (ABCA) was completed on September 30, 2021, and revised on November 8, 2022. A detailed scope of work for cleanup activities will be developed based on the ABCA results, previous assessment results, and upon notification of award of this grant. The City of Perry will develop a Generic Quality Assurance Project Plan (QAPP) as required by EPA Region IV prior to initiating any confirmatory sampling activities on the site. The City of Perry will provide general project oversight and environmental coordination through its selected, qualified environmental engineering firm. The Georgia EPD will also provide technical review of all remedial documents, upon request. The City of Perry will comply with all applicable federal and state laws and ensure that the cleanup protects human health and the environment.

- b. Regarding potential impact to adjacent or neighboring properties, the City of Perry will continue to work closely with the community to develop a site access plan to minimize inconvenience to neighboring residents and businesses. The City of Perry will hold information meetings for surrounding businesses and residents prior to commencement of cleanup activities in order to receive input on site access issues and to receive recommendations on this topic. The subject property is located adjacent to a state highway with adequate site access, and it is not anticipated that remedial activities or installation of remediation equipment will cause disruptions of business or lack of access to adjacent residential properties. Site access from adjacent property owners is not anticipated. The City of Perry will enter into site access agreements outlining locations of equipment and remedial activities and conditions agreeable to adjacent property owners, should such access be required. An OSHA health and safety plan will be developed to ensure that potential health and safety issues will be addressed for workers under OSHA 1910.120 and the surrounding community.

#### **14. COMMUNITY NOTIFICATION:**

- a. Draft Analysis of Brownfield Cleanup Alternatives

The community was offered an opportunity to comment on our draft proposal and the draft Analysis of Brownfields Cleanup Alternatives (ABCA) at three separate public meetings with the most recent occurring on November 2, 2022, and through our Community Notification ad which stated these documents were available for review. The draft Analysis of Brownfields Cleanup Alternatives (ABCA) summarized information about the site and contamination issues, cleanup standards, applicable laws, cleanup alternatives considered, and the proposed cleanup. It also included information on the effectiveness, the ability of the grantee to implement each alternative, the ability of the applicant to implement, the resilience to address potential adverse impacts caused by extreme weather events, the cost of each proposed cleanup alternative and an analysis of the reasonableness of the various cleanup alternatives considered, including the proposed cleanup.

- b. Community Notification Ad

A community notification ad was published on October 6, 2022 on the City of Perry website. The ad clearly stated:

- that a copy of this grant proposal, including the draft ABCA, was available for public review and comment at Perry City Hall, 1211 Washington Street, Perry, Georgia 37069

- Comment on draft proposal will be via public engagement meeting or email/ phone
- The draft proposal will be available via email request; and
- The public meeting will be held on November 2, 2022 at 12:00 PM.

**c. Public Meeting**

The City of Perry held a public meeting to provide the community with notice of its intent to apply for this EPA Brownfield Grant and allow the community an opportunity to comment on the draft proposal on November 2, 2022 at 12:00 PM at Perry City Hall.

**d. Submission of Community Notification Documents**

Attached are:

- a copy of the draft ABCA;
- a copy of the ad (or equivalent) that demonstrates notification to the public and solicitation for comments on the proposal;
- the comments or a summary of the comments received;
- the City of Perry's response to those public comments;
- meeting notes or summary from the public meeting; and
- meeting sign-in sheets.

**15. Contractors and Subrecipients:**

Not applicable. The City of Perry does not have a pre-selected contractor for this project, and upon award will contract for the services of a qualified engineering firm experienced in Brownfields redevelopment to perform cleanup oversight activities and related services. The selected firm will be procured in full compliance with the federal procurement provisions of 2 CFR 200 and 2 CFR Part 1500. Further, the City of Perry will utilize EPA's Best Practice Guide on complying with competition requirements.

The City of Perry will be the sole recipient of EPA funding, and no subrecipients are anticipated for this cleanup grant project.

## **Site Characterization – State Letter**



**Richard E. Dunn, Director**

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**Land Protection Branch**  
2 Martin Luther King, Jr. Drive  
Suite 1054, East Tower  
Atlanta, Georgia 30334  
404-657-8600

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October 26, 2022

**VIA ELECTRONIC Mail** [robert.smith@perry-ga.gov](mailto:robert.smith@perry-ga.gov)

Mr. Robert Smith  
Assistant City Manager  
1211 Washington Street  
P.O. Box 2030  
Perry, GA 31069

RE: State Acknowledgement Letter – Brownfield Cleanup Grant Application– Stanley Assemblage  
1101, 1107, & 1109 Macon Road and 1102 & 1104 Meeting Street, Perry, Houston County,  
Georgia

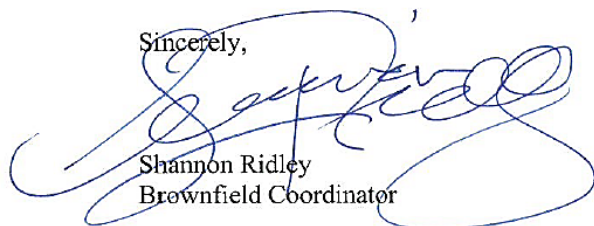
Dear Mr. Smith:

This letter serves as acknowledgement from the Georgia Environmental Protection Division (“GA EPD”) that the City of Perry will be submitting an application to the U.S. Environmental Protection Agency (“EPA”) for funding assistance under the federal Cleanup Grant. GA EPD understands that the City is applying for \$500,000 that will be used to clean up petroleum and hazardous constituents on the brownfield property, Stanley Assemblage, located at 1101, 1107, & 1109 Macon Road and 1102 & 1104 Meeting Street, in Perry, Houston County, Georgia (hereinafter “subject property”).

The subject property was accepted into the Georgia Brownfield Program on April 22, 2021 under an approved brownfield corrective action plan (CAP). The CAP enumerates the corrective actions that will be employed to bring the soil into compliance with the appropriate cleanup standards. The responsibility for groundwater cleanup remains with the responsible party, but if they are unable to address impacts to groundwater, the State’s Hazardous Waste Trust Fund may be used. The property has been sufficiently characterized pursuant to the Georgia Brownfield Act to begin corrective action.

EPD would like to take this opportunity to encourage EPA’s positive decision in making a grant award to the City of Perry for this cleanup. A successful award would greatly assist the City in its redevelopment efforts. Thank you for your consideration.

Sincerely,



Shannon Ridley  
Brownfield Coordinator