R04-20-C-002

THE CITY OF DOTHAN, ALABAMA

POST OFFICE BOX 2128 · **DOTHAN**, ALABAMA 36302 · 334-615-3000

December 2, 2019

Brownfields Cleanup Grant Application – Hazardous Substances
Former Electrical Substation Site
Corner of Linden and Whiddon Street
Dothan, Houston County, Alabama

The City of Dothan, Alabama, is submitting this proposal for an EPA Brownfields Cleanup Grant for the removal of hazardous substances from the former electrical substation site located adjacent to Aunt Katie's Community Garden, 602 Linden Street, Dothan, AL 36303. The City is requesting $297,000 to remove hazardous substances (arsenic) from the soil.

Preliminary information on our project is as follows:

1. Applicant Identification: City of Dothan, Alabama
126 North Andrews Street
Dothan, Alabama 36303-4838

2. Funding Requested:
   a) Grant Type: Single Site Cleanup
   b) Federal Funds Requested:
      i). $297,000
      ii) No cost share waiver requested
      iv) Contamination: Hazardous Substances

3. Location: Corner of Linden and Whiddon Street, Dothan, AL

4. Property Information: Former Electrical Substation, Corner of Linden and Whiddon Street, Dothan, AL 36303

5. Contacts:

a) Project Director
Robert (Bob) Wilkerson
Planner II, Planning and Development
126 North Andrews St.,
Dothan, AL 36303
bwilkerson@dothan.org
Phone: (334)615-3415

b) Chief Executive
Mark Saliba
Mayor of Dothan
126 North Andrews St.
Dothan, AL 36303
mayor@dothan.org
Phone: (334)615-3310

6. Population: 68,247

7. Other Factors Checklist:

Other Factors	Page #
None of the Other Factors are applicable.	
Community population is 10,000 or less.	5*
Applicant is, or will assist, a federally recognized Indian tribe or United States	
The proposed brownfield site(s) is impacted by mine-scarred land.	
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the project/redevelopment; secured resource is identified in the Narrative and substantiated in the attached documentation.	4,5
The proposed site(s) is adjacent to a body of water (i.e., the border of the site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	
The proposed site is in a federally designated flood plain.	
The redevelopment of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy; or any energy efficiency improvement projects.	

** Note: City has population >10,000, but the "target community" has 2,200.*

8. Letter from the State or Tribal Environmental Authority: A support letter from the Alabama Department of Environmental Management is included as Attachment A, followed by the narrative proposal (Attachment B) and Threshold Criteria (Attachment C). We are confident that our application has been prepared in accordance with your guidelines, and that our project represents an excellent candidate for funding. We look forward to hearing from you soon, and working with you as we continue to build on the momentum already established in our existing brownfields program.

Attachment A
ADEM Support Letter

LANCE R. LEFLEUR
DIRECTOR

Kay Ivey
GOVERNOR

Alabama Department of Environmental Management
adem.alabama.gov
1400 Coliseum Blvd. 36110-2400 ■ Post Office Box 301463
Montgomery, Alabama 36130-1463
(334) 271-7700 ■ FAX (334) 271-7950

November 15, 2019

Mr. Bob Wilkerson
City of Dothan
Post Office Box 2128
Dothan, Alabama 36302

RE: Brownfields Cleanup Grant Support Letter

Dear Mr. Wilkerson:

We are pleased to support the City of Dothan in its pursuit of a Brownfields Cleanup Grant from the US Environmental Protection Agency for the Dothan Community.

We understand that the target site is a former electrical substation owned by the City. The site consists of a 0.15-acre vacant parcel of land located in an area of mixed commercial and residential use at the southeast corner of Whiddon and Linden Streets, immediately adjacent to the existing Aunt Katie's Community Garden. The property has been assessed using funding from your current Community-Wide Assessment Grant, revealing the presence of elevated concentrations of arsenic in near surface soils. Pedestrians, including children, frequently walk across the site and play on it, and the City is seeking cleanup funding to remove the impacted soils for expansion of the adjacent Community Garden. The Garden, established in 2010, was developed by the Dubois Institute for Entrepreneurship, a local non-profit organization that has dedicated itself to finding ways to close disparity gaps in the community by focusing on programs that impact lower socio-economic neighborhoods. The organization expanded its outreach to advocate against childhood obesity by launching Aunt Katie's Community Garden and Urban Farm, which has made a significant impact on the local community. Aunt Katie's Garden is located in Census Tract 406, where residents face extensive challenges when compared to national, state, and county average statistics for poverty and health.

The Department has already partnered with Dothan on various community outreach activities and looks forward to providing further assistance in these endeavors. Dothan has also requested technical assistance from the Department for the Aunt Katie's Community Garden site; however, these funds and resources are available on a first come, first served basis. Therefore, we look forward to being able to assist you where possible as this project develops.

We wish you and the residents of the Dothan Community success in the pursuit of these funds. Please let us know if we can be of further assistance.

Sincerely,

Sonja B. Favors
Industrial Hazardous Waste Branch Chief
Land Division

SBF/AME
cc: Mike McCown via email, mike.mccown@ppmco.com

Birmingham Branch
110 Vulcan Road
Birmingham, AL 35209-4702
(205) 942-6168
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Decatur Branch
2715 Sandlin Road, S.W.
Decatur, AL 35603-1333
(256) 353-1713
(256) 340-9359 (FAX)

Mobile Branch
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Mobile, AL 36615-1131
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(251) 479-2593 (FAX)

Mobile-Coastal
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Mobile, AL 36608
(251) 304-1176
(251) 304-1189 (FAX)

Attachment B
Narrative Proposal

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

1.a Target Area and Brownfields

i. Background and Description of Target Area: The City of Dothan (population 68,202) is located in Houston County in the extreme southeast corner of Alabama. Originally established on timber harvesting, the Dothan economy became a leader in cotton agriculture before the boll weevil insect decimated the cotton crops in 1910. The area turned to production of peanuts and, with the help of George Washington Carver, became known as the "Peanut Capital of the World". Dothan's post-World War II economy transitioned to include significant industrial production, and regional retail shopping, as well as a major rail corridor serving southeast Georgia, northwest Florida and southeast Alabama. US Highway 231, which passes through the heart of the City, became a major route for vacationers from across the Southeast to the beaches along the Florida Gulf Coast, thereby facilitating the construction of the Ross Clark "Circle" bypass around the City to alleviate traffic strain on the downtown area. However, over the years, it seems the Circle has become more of a boundary that divides the City. New residential and retail development occurs primarily outside the Circle, causing a classic case of suburban sprawl.

The *"Inside the Circle"* downtown area has slowly declined, with the worst impacts felt by the ***Baptist Bottom neighborhood*** covered by US Census Tract 406 (described in detail in *Section 2*), which is **the target area** where this cleanup grant will be utilized. The ***Baptist Bottom target area*** draws its name from early residents who occupied the neighborhood, made up of African American citizens primarily of the Baptist faith, living in the less desirable, low topographical area of the City due to its undesirable flood-prone characteristics. The Baptist Bottom target area consists of 300 acres, roughly bounded by Montgomery Highway to the north, North Park Avenue to the west, West. Burdeshaw Street to the south and Oates Street to the east. The poor economic, environmental, and health conditions and associated brownfields in the *Baptist Bottom* target area helped in award of an EPA Brownfields Community-Wide Assessment Grant in 2017 (Cooperative Agreement No. BF-00D58117). This seed money has been used to assess numerous brownfield sites in the *Baptist Bottom* distressed neighborhood and to prioritize sites for cleanup and redevelopment. The potential for economic stimulus as a result of these redevelopments is high, as several sites in the target area have already attracted interest from private businesses and the City. In addition, the Wiregrass Foundation, a local successful non-profit dedicated to community development, has keen interest in the target area and are willing to invest/finance in this community for projects such as a learning center, library, health facility, etc. Creating "stability and sustainability" through education is a primary goal for the organization, as they believe that is a key to elevating people out of poverty.

One of the sites already assessed with EPA Assessment Grant funds in *Baptist Bottom* is an arsenic-contaminated former electrical substation site, the **priority/target brownfield** that is the focus of this grant proposal. This brownfield site is located adjacent to the non-profit ***Aunt Katie's Community Garden.*** The Garden, in operation for the past 9 years, has become an institution within the *Baptist Bottom*, providing fresh food, environmental education, mentoring of disadvantaged youths, and a beacon of inspiration and hope for residents left behind in a long decline of the surrounding neighborhood. Named for Katie Hayes Kirkland who lived across the street from the Community Garden until her recent death at the age of 97, the Garden actually carries on her decades of community service as one who fed the hungry from her home on Sunday afternoons. If awarded a cleanup grant, the City of Dothan will complete remediation of the former substation site and position the Community Garden to take ownership which will provide for significant expansion of Garden production. This expansion onto the *priority brownfield site* will enable *Aunt Katie's Community Garden* to be a self-sustaining operation by providing fresh greens to local restaurateurs and others on a year-round basis. Achievement of *economic sustainability* will stabilize the reach and impact of the Garden's well-established social and educational outreach programs and its status as an anchor for revitalization and creation of healthy lifestyles within the *Baptist Bottom* neighborhood. This project represents an excellent candidate for funding under the EPA brownfields program, as it will result in redevelopment of a contaminated site into greenspace that engages the local residents in the process of growing healthy organic foods, while fostering a model for economic progress in the long overlooked *Baptist Bottom* neighborhood.

ii. Description of the Brownfield Site: The target property for cleanup, a former electrical substation owned by the City since 1957, consists of a 0.15-acre vacant parcel at the intersection of Whiddon and Linden Streets in the *Baptist Bottom* target area. The property was developed and used as an electrical substation by Alabama Power from 1961 until at least 1997, and has remained vacant since that time. The property is primarily covered with grass, except for the center of the site where vegetation refuses to grow. This former electrical substation is located immediately adjacent to the existing *Aunt Katie's Community Garden*. Dothan used the current Assessment Grant funding to conduct Phase I and II Environmental Site Assessments (ESAs) on the property to evaluate site conditions. The surrounding *Baptist Bottom* neighborhood properties have been residential since at least 1920, except for the adjoining property to the south which was previously occupied by a store/restaurant (now occupied by *Aunt Katie's Community Garden*, which was developed in 2010). *Baptist Bottom* pedestrians, including children, frequently walk across the site and play on the property. Baptist Bottom has a proud history as a once-stable and sustaining minority neighborhood. Cottage houses with sidewalks and tree-lined streets once made this a desirable place to live. The neighborhood was filled with markets, shops, and churches serving the neighborhood residents as a highly walkable community. Since the mid-1960's, *Baptist Bottom* has suffered loss of residents, businesses, property values, and property conditions. *Aunt Katie's Community Garden* has pioneered revitalization while giving residents a sense of hope that additional improvements will cluster around the Garden and help return *Baptist Bottom* to the desirable and economically sustainable neighborhood it once was.

Soils in the center of the target property are exposed and have been unable to support the growth of vegetation since the removal of the substation around 1997. The reason for the exposed soil is unknown, but this condition may be

a residual effect of the substation. A release was never reported at the site; however, the period of substation operation overlapped the periods that polychlorinated biphenyl (PCB)-transformers were likely in use and before any regulatory oversight was in place. In July 2018, using funds from the City's Brownfield Assessment Grant, nine borings were advanced at the site, and soil samples were screened for the presence of PCBs and tested by a laboratory for volatile and semi-volatile organic compounds (VOC/SVOCs) and metals. The results were compared to EPA Regional Screening Levels (RSLs). Minor concentrations of PCBs were detected via field screening, but none were found during laboratory testing. VOCs were not detected. SVOCs were detected in several of the soil samples, but only the sample located at the center of the property had concentrations that exceeded Residential RSLs (benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, and indeno(1,2,3-cd) pyrene), which are all polynuclear aromatic hydrocarbons (PAHs). PAHs can be ubiquitous to long-settled urban properties due to the combustion of petroleum fuels and runoff from city streets; however, the location of the elevated PAHs in the center of the property indicates an onsite source. A possible source that may be associated with the property's past use as an electrical substation may be the use of heavy oils in machinery or wood materials treated with creosote.

Arsenic was the only RCRA metal detected with concentrations (<0.37 mg/kg to 1,100 mg/kg) exceeding Residential RSLs. Arsenic is naturally-occurring in the eastern United States at a mean concentration of 7.4 mg/kg. While it is possible that some of the arsenic concentrations represent naturally-occurring background concentrations, the higher detected concentrations (up to 1,100 mg/kg) are indicative of an anthropogenic source, especially since elevated PAH concentrations were found in this same area. Groundwater was not encountered at the site in borings advanced to 40 feet; therefore, threats to groundwater are considered minimal.

Although there is no obvious use of arsenic associated with electric substations, a possible explanation may be that arsenic was used to control rodents in an effort to minimize potential damage to electrical lines, or as an herbicide to control weeds. It is also possible that the arsenic is associated with use of wood products treated with copper-chromium-arsenic (CCA), which would explain the elevated PAH concentrations as well. In both cases, shallow soils are impacted. Arsenic applied to loose sandy surface soils could leach into deeper subsurface soils as evidenced by generally greater concentrations in deeper clayey soils.

These findings indicate that the primary contaminant of concern (COC) at the site is arsenic, which is likely above RSLs over the entire property to a depth of 4 feet. The arsenic appears to have leached from the surface through the loose, sandy surface soils to deeper subsurface clayey soils where it was able to accumulate. Groundwater was not encountered during the Phase II ESA; therefore, site-specific groundwater flow direction could not be determined. Based on topography of the area, groundwater is believed to flow southeast toward a nearby small stream approximately 300 feet from the site. The real concern is the potential for dermal, inhalation and ingestion of contaminants by local residents and workers at the Garden once it expands onto the property. The area of impact is estimated at 6,795 square feet, to at least 4 feet in depth, and cleanup of this area is the focus of this cleanup grant application.

While the Baptist "*Bottom*" is not currently in a federally designated floodplain, it is so named for the low topographic profile of the area that once experienced significant flooding. Over the past, the City has invested in improved storm water infrastructure in the neighborhood which has eliminated the frequency of flooding and sewer overflows.

1.b. Revitalization of the Target Area

i. Reuse Strategy and Alignment with Revitalization Plans: After cleanup, the community plans to expand the footprint of the adjacent *Aunt Katie's Community Garden* onto the property. The Garden, established in 2010, was developed by the *Dubois Institute for Entrepreneurship*, a local non-profit 501(c)(3) community development organization led by Mr. Michael Jackson. Mr. Jackson grew up in *Baptist Bottom* and after many years in Detroit, returned to Dothan with the mission of making a real difference in the neighborhood of his youth. Over the past 9 years, he has remained true to his mission through tireless efforts to raise funds for ongoing operations, develop educational programs, teach environmental lessons to school children groups; mentor neighborhood children, and plant, tend and harvest the fresh foods. Mr. Jackson has never relied on the Community Garden's cash flow to supply him with personal income, and has always put the Garden's financial needs first. The DuBois Institute recognizes that poverty is the underpinning of disparities in society and often acts as a multiplier in numerous key prevalence rates (access to health-care, food, housing, education and chronic diseases). They seek to encourage entrepreneurship as a strategy to mitigate poverty. Throughout its history, the DuBois Institute has dedicated itself to finding ways to close disparity gaps in the community by focusing on programs that impact lower socio-economic neighborhoods. From small business symposiums to tobacco prevention projects, the organization has been successful in numerous local and state campaigns.

The Institute expanded its outreach to advocate against childhood obesity by launching *Aunt Katie's Community Garden and Urban Farm* in 2010. The role of the Garden is to help reduce childhood obesity; boost economic opportunities at the neighborhood level; improve access to healthy local food, promote wellness; and create a walkable, healthy, and economically vibrant neighborhood. The first community garden in Dothan, the half-acre site is used for both high-density food production and as a community garden for local gardeners. The project leverages community involvement to "*Teach, Entertain and Inspire*" children and their families to learn about "real food"; to discover that food production can be beautiful, healthy, and enhance the quality of life, and to volunteer. The Garden has made a huge impact on the *Baptist Bottom* neighborhood. The associated FoodLife Center, a marketplace for fresh, affordable food, has been an immediate benefit from *Aunt Katie's Community Garden*, as produce, organic honey, and other agriculture-based products raised/developed at the Garden site are sold. The Dubois Institute plans to expand their work to launch more school-based gardens, thereby encouraging broader integration of good education into the academic curriculum of the local school system. In addition, Dubois Institute's formula for garden-based learning and nutrition education has

resulted in a partnership with Auburn University's Nutrition Education Program, which includes SNAP-Education outreach.

The Community Garden leadership plans to expand the garden footprint onto the adjoining former electrical substation priority brownfield site. Food will be grown in raised bed and tunnel houses with soils imported from other sources rather than planting in the ground, building upon the success of these techniques at the existing adjacent Garden property. These high-production techniques result in the growth of vegetables equivalent to 3 acres of farmland, which is a remarkable achievement for such a small inner city site. Using raised beds will also prevent exposure to contaminants found in subsurface soils on the site. Produce is already sold to area farm-to-table restaurants, and the construction of additional tunnel houses will help meet the established demand.

The Garden expansion project has strong alignment with other **revitalization strategies** already in place. Dothan has already utilized the Community-wide Assessment Grant to characterize contamination on the target property, therefore, cleanup activities would expand on the brownfield initiatives currently underway. The site is also located within the targeted area described in that grant application, specifically in Census Tract 406, which is already eligible for Community Development Block Grant (CDBG) funding. Locally, this area is known as the *Baptist Bottom Neighborhood*. The City's 2010-2030 Long Range Plan, which was formulated through community outreach and visioning sessions, is also aimed at revitalization of the inner core of Dothan where the property is located. The City's Long Range Plan has several primary goals that dove-tail with EPA's brownfields funding objectives and livability principles. These goals include: improving quality of life in the targeted area, improving community health, improving housing quality, improving the environment, and creating job opportunities for local residents in the target area. As discussed in greater detail in *Section 2, Dothan solicited extensive input from members of the community to help identify the goals of the Long Range Plan.*

In addition to the Long-Range Plan, the City is presently engaged with neighborhood leaders who are in the process of obtaining a 501(c) 3 non-profit status for the **Baptist Bottom Community Improvement Association,** a Community Development Corporation (CDC). District 2 City Commissioner Janasky Fleming is leading the CDC initiative. The City is assisting by revising certain zoning requirements to facilitate small *Baptist Bottom* neighborhood businesses, and to streamline permitting and other City requirements for new businesses. The City's CDBG program has made significant investment in the *Baptist Bottom* neighborhood including past grants for sidewalk improvements, funding for Habitat for Humanity's weatherization program, various non-profit programs supporting disadvantaged youths, and several grants to *Aunt Katie's Community Garden*. In late 2018, the City finalized the ***Dothan Strategic Affordable Housing Implementation Plan*** (see:*http://www.dothan.org/DocumentCenter/View/5799/Affordable-Housing-Plan-Final-Draft*) **.** Conducted by APD Urban Planning and Management, LLC of Atlanta, the plan provided analysis of 14,000 parcels "*Inside the Circle*" in Dothan. Among the many conclusions and recommendations of the plan is the glaring conditions report showing *Baptist Bottom* with the greatest concentration of blighted conditions in the entire City. The Plan's recommended "**Priority Project Area 1" is the *Baptist Bottom* neighborhood** with 35% of all parcels being either blighted or vacant. The City is currently developing a strategy to begin addressing Priority Area 1 while nearing completion of a 55-unit low-income senior housing development in another blighted neighborhood known as the NBCAR Historical District. The $14 million project is funded largely by Low-Income Tax Credits and various state and Federal Historic Tax Credits due to the development's inclusion of a historical school building's restoration and conversion into 22 apartment units. The City will seek opportunities for similar developments in the Baptist Bottom neighborhood.

These City and community non-profit initiatives show committed involvement and clear alignment between the cleanup of the electrical substation for Garden expansion and the target area's revitalization plans in an impoverished community that has experienced flooding.

ii. Outcomes and Benefits of Reuse Strategy: Cleanup of the former electrical substation for expansion of *Aunt Katie's Community Garden* will create numerous outcomes and benefits. A vibrant "local foods" movement, which insists on more direct connections between farmers and consumers, is emerging across the US. There are several key factors underscoring the importance and benefits of a robust local food system in low-income communities: (1) community members can know the source of their food; (2) the community becomes more self-reliant; (3) overall health is improved; and (4) economic development is expanded at the neighborhood level. Cleaning up and transforming the target site from an undeveloped, contaminated property to a greenspace and recreational property for non-profit purposes satisfies many of the criteria prioritized by EPA Brownfield Program, as listed in the table below. Redeveloping a contaminated former substation site that will not currently support plant growth for community garden use will create a "**working greenspace**", pairing the proven benefits of greenspace development with the production of healthy, locally produced organic foods while also engaging the local residents. The willingness of local farm-to-table restaurants to purchase food from the Garden if the tunnel houses can be constructed on the cleanup site will provide an income stream for the Garden to sustain operations, and represents a tremendous opportunity to teach *Baptist Bottom* residents about entrepreneurship and economics. While many of the details of the reuse plan and expected outcomes are presented elsewhere in this proposal, an initial summary detailing benefit alignments with *EPA strategic objectives* and with Dothan's *Strategic Plan* is provided below:

Action	Outcomes/Benefits	Alignment with EPA Desired Outcomes	Alignment with Dothan Strategic Plan
Conduct Community Meetings	Addresses environmental concerns; engages local residents in decision process; promotes objectives of the Garden.	Community engagement	Community engagement
Enter Site into ADEM VCP and use ADEM technical resources	Engages state agency in the process; facilitates rapid approvals; liability protection for new owners; leveraging of ADEM assessment funds.	State Agency buy-in; leveraging	Creating partnerships
EPA Engagement	Ensures alignment of EPA funding objectives with redevelopment.	Effective use of funding	Creating partnerships
Partner Engagement	Provides resources for construction of garden expansion; expands/promotes benefits of brownfield redevelopment/resuse.	Community engagement; leveraging	Creating partnerships
Remove Contaminated Soils	Removes blight, removes environmental contaminants and reduces future exposure; returns site to productive use.	Improves environment	Improving quality of life, community health, and environment.
Construct Garden Extension	Encourages volunteerism; engages locals in productive work; physical exercise.	Community engagement; improves public health	Improving quality of life and community health; creating job opportunities for local residents.
Plant, Maintain and Harvest Garden	Connects vegetable harvest to effort expended; physical exercise; educates residents on the food cycle, provides fresh produce in food desert; improves health' promotes entrepreneurship by selling of products.	Community Engagement; improve public health	Improving quality of life/ community health, creating job opportunities for local residents, teaching entrepreneurship, creating income stream for Garden operations.

As demonstrated above, the cleanup grant funding coincides well with the *redevelopment plans envisioned for the site* and in particular, the *Baptist Bottom* target area neighborhood. Benefits to this long-overlooked neighborhood from the expansion of *Aunt Katie's Community Garden* and its many outreach programs are significant. As the story of the Garden grows, people from all socio-economic backgrounds in the greater Dothan area are increasingly drawn to the Garden, and by doing so gain exposure to the *Baptist Bottom*. Many have never visited this neighborhood and have the erroneous opinion that it's unsafe. But because they now go there to purchase fresh greens, vegetables and honey, they also see the great need within the surrounding neighborhood and more importantly, the good citizens trying to make the *Baptist Bottom* a better place. This helps to change perceptions and bring needed additional resources to the neighborhood.

In addition, the proposed reuse will result in a *reduction in carbon emissions* by providing a readily available local source of fresh food within walking distance of many local residents, thus reducing dependence on driving vehicles to grocery stores located outside of the local "food desert". The Garden will depend on *solar energy* to thrive, and no other energy sources are anticipated to be required. *Greenspace and recreational space* will be created for non-profit use, in addition to teaching *economic development*. While not directly located in an Opportunity Zone, the *Baptist Bottom* neighborhood immediately abuts one to the east, and there is no doubt that economic activity will increase in this adjacent Opportunity Zone as people are lifted out of poverty through the planned revitalization efforts. *These features and benefits point to a unique and successful outcome from a brownfields cleanup action.*

1.c Strategy for Leveraging Resources

i. Resources Needed for Site Reuse: There are many sources of leveraging that Dothan is currently or will be drawing from in order to facilitate cleanup and redevelopment of the target property. **Committed leveraged resources**, **in the amount of $37,748**, include:

- Former Mayor Mike Schmitz, owner of Schmitz Automotive Group, is donating **$7,000** for the construction of tunnel houses to grow plants after the cleanup is complete *(see support letter in Attachment A).*
- David Johnson, a local retired electrical engineer and long-time supporter of the Dubois Institute and the Garden, is donating **$7,000** for the additional Garden extension after cleanup *(see support letter in Attachment A).*
- Mark Saliba, president of Mark Saliba Corporation (local contractor) and current Mayor of Dothan, oversees the Saliba Foundation, and has also pledged **$500** for the construction of tunnel houses *(see support letter in Attachment A).*
- The City's 2017 EPA Brownfields Community-Wide Assessment Grant will be used for cleanup planning, finalization of the draft Analysis of Brownfields Cleanup Alternatives (ABCA), and collection of additional soil samples to determine background arsenic concentrations in the Garden area, at an estimated amount of **$9,500**. This grant has already been used to conduct Phase I and II ESAs on the site, facilitate community meetings, and develop a draft ABCA.
- Dothan recently installed a chain link fence around the property to prevent access at a cost of **$5,248**, which will remain after cleanup *(see purchase order in Attachment A).*

- ADEM is already providing resources for this project and the current assessment grant by facilitating visioning events with the impacted communities. Dothan has requested ADEM Section 128(a) technical assistance for additional sampling at the site to further determine the extent of arsenic impact prior to cleanup, which ADEM has indicated they will fund if possible as the project develops *(see support letter in Attachment A).* Funding is estimated at **$8,500.**
- The Dubois Institute for Entrepreneurship (non-profit creator of the Community Garden) has provided, and will continue to provide, on-site facilities for public meetings and community education *(no dollar amount assigned, but this serves as an important resource).* They will continue to seek commitments for construction materials and labor for building tunnel houses on the target site, in addition to those already secured above.

Anticipated additional leveraged resources that will help augment the committed resources listed above include:

- The Dubois Institute has received $67,500 in funding from the City's CDBG to redevelop a dilapidated structure on the Garden site for education classes, as well as $22,500 for administration of the non-profit organization. Though not quantified at this time, additional CBDG funding is anticipated in the 2021 budget.
- The Wiregrass Foundation provides $4 million per year to non-profits in the Wiregrass Region, where Dothan is located. The Foundation has already provided $50,000 in funds to the Dubois Institute, including $25,000 recently donated to renovate the Community Garden education center *(see letter in Attachment A).* The Institute will seek additional funding from the Foundation to continue their efforts to impact the community with the Garden.

ii. Use of Existing Infrastructure: Sidewalks along Chickasaw Street provide convenient *walkability* access to the Garden for *Baptist Bottom* residents, including those residing in a large public housing development near the site. The low-impact reuse strategy and end use for the site will not require the installation of new infrastructure, and will only require access to water for the watering of plants in the raised beds and tunnel houses during dry times. City water is already available at the adjacent Garden site, which will be utilized on the expanded garden.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

2.a. Community Need

i. The Community's Need for Funding: *Aunt Katie's Community Garden* is located in Census Tract 406, which is within Dothan's Enterprise Zone and CDBG area. According to the *2011-2015 American Community Survey on American Fact* Finder, this **small population, low-income minority neighborhood of approximately 2,200 residents** comprising *Baptist Bottom* faces extensive challenges when compared to national, state, and county average statistics. Key significant statistical disparities of Baptist Bottom residents to national metrics are as follows:

- 55% of families living below the poverty line- *four times the national average*
- Unemployment rate of 10.9%, *twice that of the national average*
- 30% housing vacancy rate vs. 12% national average
- 30% of residents with no means of transportation
- Per capita income of $9,807-*three times below the national average*
- 47% of residents on food stamps

The following glaring quote taken from the *Affordable Housing Study* referenced in *Section 1.b.i* offers a sobering statistic:

"Throughout community engagement and outreach activities, participants cited Baptist Bottom (within Project Priority Area 1) as an area with blight due to the high number of homes in bleak condition and the prevalence of vacant lots. Synonymous with these statements, this area has a high concentration of blighted and vacant lots. A tenth (12% or 84 properties) of all single-family homes are in blighted condition within the area. Additionally, over a fifth (23% or 285 properties) of all properties are classified as vacant lots within the area."

A substantially higher percentage of sensitive populations also live in the *Baptist Bottom* census tract, including 9.2% under 5 years of age, and **82.5% minority**. All of this may be indicative of an *environmental justice* issue in the area. This community does not have the resources or funding to address environmental remediation and redevelopment, and the cleanup of the former electrical substation is highly unlikely without award of a cleanup grant.

ii. Threats to Sensitive Populations

(1) *Health or Welfare of Sensitive Populations*: The condition and threats to sensitive populations in the **Baptist Bottom target area** (Census Tract 406) have already been identified in the Community-wide Assessment Grant activities. Blight is highly prevalent throughout the *Baptist Bottom* neighborhood, as evidenced by the numerous abandoned buildings and houses with broken windows choked by overgrown vegetation. Now in the second generation since families began leaving the neighborhood, many who inherited properties live in other cities across the US. Most have no interest in the inherited property nor the neighborhood and allow the blight and unkempt conditions to continue. The deteriorated condition of these structures has contributed to lower property values as evidenced by US Census data. The City has safety concerns associated with these brownfields, and environmental concerns associated with these structures are prevalent due to the likely presence of asbestos and lead-based paint. Children find abandoned houses as interesting places to play, exposing them to friable lead-based paint and the associated health dangers. These abandoned structures have also become magnets for vagrancy and criminal activity. When owners are located and contacted by the City and informed of such conditions, most refuse to take action to secure or improve the property. Similarly, local slum

lords often rent these shacks to disadvantaged folks who have limited housing options. Renters are therefore exposed to lead-based paint and placed at risk of health from their dwelling. The City of Dothan is developing a rental registry ordinance intended to combat this health threat by requiring city inspections for housing code compliance prior to occupation by a renter. The Dothan Police Department mined their database of arrest reports to determine where the highest percentage of crimes had been committed in relationship to existing brownfield sites. Statistics from the Department show that crimes were clustered around properties listed in the City's GIS brownfield inventory. City data shows numerous crimes committed within 550 feet of brownfields sites including *the target site*. *Neighborhood Scout* also confirmed that the city center, where the Garden and most of the brownfield sites are located, has a much higher crime rate than the rest of the City. Violent crime was reported to be nearly four times higher within the City center than compared to Dothan as a whole (15.9 versus 4.0 per 1,000 people). Property crimes were more than double for the target area when compared to Dothan (64.8 versus 31.7 per 1,000 people). There is also a lack of transportation and other public services in the target area, with over 30% of households in the target area having no vehicle. The US Department of Health and Human Services also indicates that there are no federally-qualified health centers in the target area. The US Census and CARES data for 2014 indicate a shortage of grocery stores with a rate of 15.76 per 100,000 compared to the US rate of 21.1 – indicative of a "*food desert*".

We reached out to Cory Kirkland, Brownfields Steering Committee Member and Administrator for the Houston County Health Department, for other health statistics specific to the *Baptist Bottom Neighborhood*. Mr. Kirkland stated that, unfortunately, he has never had the funding resources to conduct needed studies specific to segments of the County's population known to be at high risk of health. If awarded this cleanup grant, the City could fund a limited study of *Baptist Bottom* health concerns in partnership with our local medical School, The Alabama College of Osteopathic Medicine; and/or conduct a *Community Health Assessment* (other eligible activity) using funds from award of a 2020 Community-Wide Assessment Grant that Dothan is pursuing separately from this cleanup grant.

(2) ***Greater Than Normal Incidence of Disease and Adverse Health Conditions***: In their 2007 report, *Indicators of Health Status in Alabama*, the Alabama Department of Public Health reports that the Southeastern Alabama Wiregrass Region (which includes Dothan) has the second highest cancer rate in the state (26% higher than the national average). Some types of cancer, such as ovarian cancer, are 30% higher than the national average and 15% higher than the state average. Neurological disorders are even worse. The rate of Alzheimer's disease is 42% higher than the state average and 93% higher than the national average. Chronic respiratory diseases in Houston County are reported to be approximately 19% higher than that of the national average. Infant mortality is 24% higher in Houston County than the national average, and African Americans in Houston County have a 15% higher infant mortality rate than Caucasians. Of post-neonatal deaths, African Americans have a 600% greater death rate than Caucasians in Houston County. According to 2013 CDC and Houston County data, low birth rates in Houston County were 46% higher than that of the US average. While we do not currently have health statistics specific to *Baptist Bottom,* we do know that the area is over 82% African American, and it is likely that these dismal regional health statistics would be experienced by the majority minority residents in this neighborhood. While health concerns for these neighborhood residents has not been considered to be a priority of others, the City has identified an avenue for conducting that task as an outreach component under the cleanup and the assessment grants, if awarded.

Scorecard.com reports that across the US, 2.2% of all preschoolers have enough lead in their blood to reduce intelligence and attention span, cause learning disabilities, and permanently damage a child's brain and nervous system. With as much as two-thirds of the homes in the target area constructed prior to 1960 (according to the US Census), lead-based paint is another cumulative environmental issue that needs to be addressed. The City of Dothan recently concluded an exhaustive affordable housing study. That report revealed that 35% of all parcels in *Baptist Bottom* are dilapidated and/or vacant. The existing industries in the area may also have negative health implications according to the Office of Primary Care and Rural Health, Alabama Department of Public Health. Data indicate that approximately one in every ten Alabama residents currently has asthma, that asthma prevalence rates are increasing, and that the state's rates for both lifetime and current asthma now exceed those for the U.S. as a whole. Although it is found within all subcategories of the population, the burden of asthma is unequally borne by children, females, African Americans, and those with low income and educational levels – such as those living inside the target area. These data also revealed that asthma rates for African Americans in Alabama average three percentage points higher than that of whites. Lastly, according to the Alabama Department of Public Health, current asthma prevalence in children in Alabama is 11.2% compared to the National rate of 8.9%. Deplorable housing conditions that expose inhabitants to a combination of elements including lead-based paint, roach infestations and poorly heated and cooled living conditions would reasonably contribute to the health disparity. *Baptist Bottom* children and the elderly are at greater risk and likely have a significant impact on the serious county health statistics contained in this narrative. Some of these health problems could be associated with exposure to hazardous substances or petroleum contamination, and cleanup of the former electrical substation will certainly remove exposure to the arsenic already proven to be present at the site.

(3) ***Disproportionately Impacted Populations***: According to US Census Data, the minority population living in the Baptist Bottom Census Tract is nearly triple that of the US average. The target area contains **four times** the national average for the number of families living in poverty, with a per capita income between **2 to 3 times less** than the national average. This suggests many of these people really are "working for peanuts" in the peanut capital of the world. In addition, there are numerous cumulative environmental issues that have impacted the greater community associated with industrial, commercial, and governmental operations that appear to represent potential *environmental justice* issues. According to *scorecard.com*, Houston County is in the 90th percentile for having the worst air quality in the US for developmental toxin releases. Houston County is also ranked in the 90th percentile for having the worst land releases in the US. Lead and asbestos exposure is also a strong concern in the targeted area due to the prevalence of

blight and older structures. In addition, storm water and wastewater contribute to the overall cumulative environmental issues. Dothan is currently under a Consent Order from EPA to address sanitary sewer overflow issues. Also, two major railroads run right through the targeted community generating concern for potential contaminated runoff from years of herbicide application at the railroad sites, as well as various nearby brownfield sites. Contaminants, such as benzo(a)pyrene and tetrachloethylene (PCE), have shown up in the municipal water supply. Although these contaminants are currently below EPA maximum contaminant levels (MCLs), they are an indicator that contaminants are mobile and are migrating into the drinking water supply from brownfield sites and industrial and commercial properties such as abandoned gas stations and dry cleaners. Cleanup of the former electrical substation will eliminate the potential for arsenic impact to target area residents.

2.b. Community Engagement

i. *Project Partners*, and, **ii. *Project Partner Roles***: The interest in and support of *Aunt Katie's Community Garden* and the proposed cleanup actions has received significant support from the community and other project partners. The City of Dothan has hosted two separate community meetings (January and November, 2019) at the Garden to discuss the cleanup grant and proposed Garden expansion onto the impacted site. The City has led the cleanup initiative, and the Garden expansion has been led by *The Dubois Institute for Entrepreneurship* (Michael Jackson, mjackson@dife.us; 334-403-1765), a fully functional and effective community partner in full swing at the target property who has worked tirelessly to engage and improve the *Baptist Bottom* community. The Institute operates the Garden, and has been very effective in garnering community support and securing partners for expansion of the Garden and the construction of the additional raised bed and tunnel houses on the target property after cleanup. Community project partners/supporters who have donated cash, labor, in-kind donations, and other resources to the Garden include *Rankin Construction Company* (Bruce Rankin, 334-792-8172); *Bowen Pharmacy* (Tina Stringer, 334-794-4211); *Houston Seat Cover*, (334-792-5003); *Glass Doctor*-Dothan, (334-794-0729); *Don McCleod Foundations, Wiregrass Foundation* (Barbara Alford (334-699-2472); *Southeast Alabama Community Foundation* (Millie Armstrong, milie.armstrong@sacfinfo.org, 334-446-0247); *Reverend Shirley Reeves*, and numerous other individuals. Individual supporters along with this *diverse group of corporate partners and non-profits* combine to provide *Aunt Katie's Community Garden* with the support and resources vital to the continued operations and expansion of the Garden. Just as important as the City's Brownfield Project Outreach is the outreach from the Garden to residents of the neighborhood. The Garden's expansion of tunnel house operations onto the cleanup site will increase its ability to engage school children groups for urban agriculture education and encouragement for consuming fresh foods. The expansion also increases outreach by providing year-round vegetables to *Baptist Bottom* residents in need.

iii. Incorporating Community Input: Dothan developed a Community Involvement Plan (CIP) as a part of the current 2017 brownfield assessment grant. Additionally, community involvement has been a cornerstone of the success of the City's Long Range Plan for over seven years. ADEM hosted a visioning session to address brownfield redevelopment. The public has been enlisted to help shape the future of Downtown Dothan via surveys on utility bills, the City website, and a series of articles in the local newspaper. After receiving over 1,700 responses, Dothan was able to incorporate the citizens' desires into the planning process for downtown revitalization and job creation.

This success continued with two well-attended public meetings in the last 12 months: the first in January 2019, and the most recent on November 13, 2019, both held in *Baptist Bottom* at the Community Garden site. **Neighborhood residents, supporting partners**, **Brownfield Project Steering Committee members, City officials, and local press members attended and gave input**. The proposed *Aunt Katie's Community Garden* expansion has been presented in both meetings. Concerns regarding the impacted soils found during the Phase II ESA at the former transformer site were discussed openly, and the interest level for remediation of the impacted soils and the expansion of the Garden was high. The meeting was advertised via print media in advance. City staff provided on-camera interviews regarding the project a week prior to and immediately following the meeting, and the City's public Information Officer distributed a press release to further promote awareness and attendance. A draft of the ABCA/grant application was available for review. No objections to the project were raised, and Dothan is confident that we have full community support for the cleanup and expansion. An additional meeting will be held prior to scheduling of construction activities, which will be advertised through the previous effective methods including website updates, social media posts, direct responses by phone, or meetings and email based on the preferences of the inquirer. Monthly briefings will be posted on the brownfield section of the City website and on the Garden's bulletin board and social media pages as the project progresses. Once cleanup is complete, a ribbon cutting ceremony will be held to celebrate the achievement. ADEM and the EPA will be invited to attend the ribbon cutting along with the local community. The above listed past activities and sound plans for the future demonstrate that significant input will be solicited from the local community, partners, and groups, and that that input will be considered and responded to in order to support the project goals and meet the needs of the community.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

3.a. Proposed Cleanup Plan

A draft ABCA that presented several cleanup alternatives to address the impacted soils at the site was developed. The recommended alternative, based on the findings from the Phase II ESA and discussions with ADEM, includes excavation and landfill disposal of shallow soils impacted by arsenic and PAH, followed by engineering and institutional controls. While additional sampling and a risk assessment may be required by ADEM (using current available assessment grant funds) to further evaluate the contaminant distribution and risks at the site, Dothan has a high level of confidence that such additional work will confirm our current understanding of site conditions. The recommended cleanup will consist of the following:

- Collection of additional samples (*using current assessment grant funds, and resources from ADEM*) to determine naturally occurring (background) arsenic concentrations and to further delineate the area requiring excavation.
- Entry of the site into the ADEM Voluntary Cleanup Program (VCP).
- Preparation of bid documents for the proposed excavation and solicitation of bids from qualified contractors.
- Excavation of the upper 2 feet of soils across the 0.15-acre site; segregation of materials into distinct units, and waste characterization of excavated materials to determine landfill disposal options.
- Collection of confirmation samples from the base and sidewalls of the excavation.
- Transportation of the soils to an approved landfill for disposal.
- Engineering controls, to include placement of a witness barrier to establish a visible boundary between soils greater than 2 feet deep and the clean backfill material.
- Backfilling of the excavation with clean, imported fill and a layer of topsoil, and reseeding with grass.
- Preparation of a final report and placement of restrictive covenants (if required).

To reduce disposal costs, steps will be taken to segregate hazardous soils from non-hazardous soils. The distribution of detected arsenic concentrations were evaluated across the site to estimate the potential volume of soils that would be considered hazardous. This exercise yielded a potential range of 355 to 706 tons of hazardous wastes and an estimated project cost of $297,000 for removal and disposal only. The actual cost of the project is dependent on the volume of excavated material that is deemed hazardous. A full description of the cleanup plan and logic used to estimate the cost is included in the attached draft ABCA. Excavation of metal-impacted soils is a common method of cleanup, and the City is confident in the effectiveness and plausibility of the proposed cleanup method.

3.b. Description of Tasks, Activities and Outputs

The cleanup grant guidelines for this section request that *(i) Project Implementation; (ii) Schedule (iii), Task Activity/ Lead*, and *(iv) Outputs* be addressed. Due to the close relation between these items and for ease of presentation, the City has addressed these criteria in a single table, provided below. This table provides a detailed listing of the major tasks to be completed, the activities/subtasks associated with each task, who will lead task efforts, the anticipated outputs, the schedule for completion, and how Dothan and other teaming partners will contribute to the effort. Projected costs for each of the major subtasks/outputs are included in *Section 3.C, Cost Estimates*. The City is confident that these tasks/activities are eligible for reimbursement and appropriate to meet the project goals.

i. Implementation/ Tasks	Activties/Subtasks	Details		
		ii. Schedule	iii. Lead Entity	iv. Outputs
TASK 1 Project Management/ Reporting	Execute Cooperative Agreement	30 days after award	Applicant	Executed Cooperative Agreement, grant management oversight, contract with an EP, 12 quarterly reports, ACRES database updates, closeout documents
	Grant Management	Continuous	Applicant	
	Select EP	60 days after award	Applicant	
	Prepare EPA Progress Reports	Quarterly	Applicant & EP	
	Travel to Brownfield Conference (1 person)	Year 1	Applicant	
	Final Closeout	30 days after grant closeout	Applicant	
TASK 2 Community Involvement	Update CIP	30 days after award	Applicant and EP	Updated CIP; 3 meetings/ minutes
	Community Mtgs.	Quarters (Q) 1, 4, and 5	Applicant and EP	
TASK 3 Cleanup Planning	Additional Sampling	90 days after award	EP	Final ABCA, meeting with ADEM/minutes, final CAP, bid specification document, qualified bids, selected subcontractor contract documents, VCP application
	Final ABCA	Q2	EP	
	ADEM VCP Mtg.	Q2	Applicant and EP	
	Corrective Action Plan (CAP)	Q3	EP	
	Prepare Bid Documents	Q3	Applicant and EP	
	Subcontractor Selection	Q3	Applicant and EP	
	Enroll in VCP	Q3	Applicant	

TASK 4 **Cleanup Activities**	Kickoff	Q4	Applicant and EP	Kickoff meeting/ minutes, equipment staging, removal of contamination, lab reports, backfilling of excavation, a final cleanup report, restrictive covenant
	Equipment Staging	Q4	EP and Applicant	
	Soil Excavation/ Transport / Disposal	Q4	EP and Applicant	
	Confirmation Sampling	Q4	EP	
	Backfilling	Q4	EP	
	Report Preparation	Q4	EP	
	Restrictive Covenant	Q5	Applicant and EP	

3.c Cost Estimates and Outputs

3.c.i. Cost Estimates: The anticipated budget for each of the above described tasks above, and details on the 20% cost share, is provided in the following table:

Budget Categories		Project Tasks ($) Project Management/ Administrative	Community Involvement	Cleanup Planning	Cleanup Activities	Total
Direct Costs	**Personnel**[1]	$3,000[1]	$1,200[2]	$750[3]	$2,250[4]	**$7,200**
	Travel	$2,500[5]				**$2,500**
	Equipment					
	Supplies		$500[6]			**$500**
	Contractual	$7,500[7]	$3,000[8]	$9,000[9]	$267,300[10]	**$286,800**
	Other					
Total Direct Costs		$13,000	$4,700	$9,750	$269,550	**$297,000**
Indirect Costs						
Total Federal Funding (not to exceed $500,000)		$13,000	$4,700	$9,750	$232,500	**$297,000**
Cost share (20% of requested federal funds)				$31,960[11]	$27,440[12]	**$59,400**
Total Budget *(Direct Costs+ Ind. Costs+Cost Share)*		**$13,000**	**$4,700**	**$41,710**	**$296,990**	**$356,400**

Federal Funding Details

[1] City Grant Manager: $75/hr x 40 hrs. = $3,000
[2] City Grant Manager at $75/hr x 16 hrs. = $1,200
[3] City Grant Manager at $75/hr x 10 hrs. = $750
[4] City Grant Manager at $75/hr x 30 hrs. = $2,250
[5] City Grant Manager travel expenses for attendance at one BF conference: $2,500 *(no labor, only conf. fee, travel/expenses)*
[6] Supplies for public outreach meeting: $500
[7] EP to assist with project mgmt./reporting: $150/hr x 50 hrs. = $7,500
[8] EP to assist with CI plan and meeting attendance: $150/hr x 20 hrs. = $3,000
[9] EP to assist with cleanup planning: $150/hr x 60 hrs. = $9,000
[10] EP for cleanup actions: $150/hr x 100 hrs. = $15,000; + subcontractor to excavate/haul/dispose/backfill ($252,300), for total of $267,300

Cost Share Details:

[11] ADEM VCP Fees: $31,960
[12] City equipment operator ($35/hr x 40 hrs. = $1,400); + City equipment ($55/hr x 40 hrs. = $2,200); + disposal of non- haz. soils in City landfill ($12.50/ton x 300 tons = $3,750); + excavation/disposal costs to EP ($20,090).

3.d. Measuring Environmental Results

The City will carefully track all outputs and outcomes (described in *Section 3.c.ii*) required in EPA Order 5700.A to ensure the grant funds are expended *in a timely and efficient manner*. Upon grant award, these will be clearly identified in the project work plan in a work schedule and will be reported in the quarterly progress reports submitted to the EPA Project Officer as well as updated in the EPA ACRES database. The mechanism for tracking progress has already been established with the Assessment Grant, which includes preparation of a detailed schedule for submittal of draft and final compliance reports with assignments; submittal of project schedules by the EP for each task with each task proposal; weekly communications between project team members via email, phone, and review of technical data via online screen sharing applications to aid in the decision process. If progress is not meeting the new project schedule established for this cleanup grant, countermeasures (meetings with the EP, contractors, ADEM, EPA to establish root cause and

corrective actions) will be implemented to get the project back on track. Key tasks and outputs to ensure the desired environmental results are achieved within the 3 year grant window are presented in the table in *Section 3.b above*.

Anticipated outcomes from the cleanup include liability protection for the new owner; alignment of EPA funding objectives with redevelopment; removal of blight; reduction or elimination of future contaminant exposure; return of site to productive use; encouragement of volunteerism; engagement of locals in productive work and physical exercise; connecting vegetable harvest to effort expended; educating residents on the food cycle, providing fresh produce in food desert; improving community health, and teaching entrepreneurship through the selling of produce raised. These outcomes, and the alignment of them with EPA and Dothan strategic plan objectives are clearly communicated in the table in *Section1.b.ii*.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

4.a Programmatic Capability

i. *Organizational Structure*, and, ***ii. Description of Key Staff***: The Dothan grant management team is already experienced with the EPA brownfield program (for Dothan and other cities). *Bob Wilkerson*, a landscape architect/planner with the Planning and Development Department has been designated to administer the grant. Mr. Wilkerson has over 35 years of professional experience in the disciplines of banking, planning, and urban design and has been a part of several successful EPA Brownfields projects (Cordova, AL, the Freshwater Land Trust in Jefferson County, AL, Regional Planning Commission of Greater Birmingham) and the current successful Dothan Community-Wide Assessment Grant. He is experienced in all aspects of grant management community engagement. Providing backup to Mr. Wilkerson is *Maurice Head*, Senior Planner. Mr. Head has over 30 years of planning and grant management experience including annual management of $3 million to operate the CDBG Program, HOME program, ESG Program, Housing Rehabilitation Programs and other City housing initiatives. He will work closely with Mr. Wilkerson ensuring that all grant compliance requirements are met.

iii. Acquiring Additional Resources: As was done with the Community-Wide Assessment Grant, Dothan will follow all EPA competitive procurement requirements of 2 CFR Part 200 for EP consultant and contractor selection, attempting to utilize Disadvantaged Business Enterprises (DBEs) where possible. Dothan is familiar with all aspects of the EPA contractor solicitation process and employed them during procurement procedures on the recently awarded brownfield assessment grant.

4.b. Past Performance and Accomplishments

i. Currently Has or Previously Received an EPA Brownfields Grant: In 2017, Dothan was awarded a $300,000 Community-Wide Assessment Grant for hazardous and petroleum sites (BF-00D58117). A significant amount has already been accomplished, as described below.

(1) ***Accomplishments***: The City has already completed numerous outputs for the 2017 assessment grant, including:

- Executed the Cooperative Agreement
- Selected an EP/consultant to provide technical services through an advertised and open solicitation process
- Submitted a grant management work plan to the EPA
- Formed a Brownfield Steering Committee
- Held two Steering Committee meetings
- Completed a CIP
- Updated and prioritized the inventory list
- Completed eight Site Eligibility Determinations
- Conducted eight Phase I ESAs
- Completed four Phase II ESAs (including the Garden site); one Phase III ESA; and one leveraged Phase II
- Prepared and received EPA/ADEM approval of a Generic and three Site-Specific QAPPs
- Entered all Phase I and II data into ACRES
- Submitted all required quarterly and annual reports to EPA
- Held three public meetings

Numerous other brownfield properties exist in this target area, and significant progress is being made toward building a successful brownfield program and moving sites towards redevelopment.

(2) ***Compliance with Grant Requirements***: Assessment grant implementation is well underway, and the City has a complete understanding of what is expected from the EPA and is in full compliance with the terms and conditions of the Cooperative Agreement and the scope and schedule presented in the approved work plan. All required quarterly and annual reports have been submitted on time, and all assessment information has been entered into ACRES. $175,457 (58%) of the awarded $300,000 was spent at 18 months, and $247,303 (82%) at 24 months - well ahead of the EPA targets. All milestones and deadlines have been met, and at the current pace, the City will easily surpass the minimum requirements of the Cooperative Agreement. The grant management team is committed to continuing this success and stewardship upon award of this cleanup grant.

ATTACHMENT A
LEVERAGED SUPPORT LETTERS

MIKE SCHMITZ AUTOMOTIVE GROUP

Mercedes-Benz of Dothan | HYUNDAI of Dothan | TRI-STATE OFF ROAD | TRI-STATE Collision Center

Michael Jackson, Director
Dubois Institute
602 Linden Street
Dothan, AL 36303

January 23, 2019

RE: Letter of Pledge and Commitment: Aunt Katie's Community Garden

Dear Mr. Jackson,

I am pleased to provide you with this letter solidifying my pledge and commitment for a cash donation in the amount of $7,000 to be utilized for the construction of tunnel house facilities at Aunt Katie's Garden. This pledge is consistent with the Garden's strategic Master Plan and potential for expansion of garden operations.

We will honor this pledge upon the successful completion of environmental cleanup of the proposed expansion site. We are aware of the City of Dothan's efforts to secure grant funding to carry out the cleanup work, and look forward to hearing from you regarding the future progress with the expansion site.

Sincerely,

Mercedes-Benz of Dothan
2309 Ross Clark Circle
Dothan, AL 36301
334.794.6716

Hyundai of Dothan
2329 Ross Clark Circle
Dothan, AL 36301
334.699.6416

Tri-State Off Road
2502 Ross Clark Circle
Dothan, AL 36301
334.699.1001

Tri-State Collision Center
901 S Oates Street
Dothan, AL 36301
334.793.1034

FROM THE DESK OF DAVID JOHNSON

Michael Jackson, Director
Dubois Institute
602 Linden Street,
Dothan, AL 36303

January 23, 2019

RE: Letter of Pledge and Commitment: Aunt Katie's Community Garden

Dear Mr. Jackson,

I am pleased to provide you with this letter solidifying my pledge and commitment for a cash donation in the amount of $ 7,000.00 to be utilized for the construction of tunnel house facilities at Aunt Katie's Garden. This pledge is consistent with the Garden's strategic Master Plan and potential for expansion of garden operations.

We will honor this pledge upon the successful completion of environmental cleanup of the proposed expansion site. We are aware of the City of Dothan's efforts to secure grant funding to carry out the cleanup work, and look forward to hearing from you regarding the future progress with the expansion site.

Sincerely,

Michael Jackson, Director
Dubois Institute
602 Linden Street,
Dothan, AL 36303

January 29, 2019

RE: Letter of Pledge and Commitment: Aunt Katie's Community Garden

Dear Mr. Jackson,

I am pleased to provide you with this letter solidifying my pledge and commitment for a cash donation in the amount of $ 500.00 to be utilized for the construction of tunnel house facilities at Aunt Katie's Garden. This pledge is consistent with the Garden's strategic Master Plan and potential for expansion of garden operations.

We will honor this pledge upon the successful completion of environmental cleanup of the proposed expansion site. We are aware of the City of Dothan's efforts to secure grant funding to carry out the cleanup work, and look forward to hearing from you regarding the future progress with the expansion site.

Sincerely,

Mark Saliba

The City of Dothan

PURCHASING DIVISION

POST OFFICE 2128
DOTHAN, ALABAMA 36302
(334)-615-3410

PURCHASE ORDER NO. 190472
THIS NUMBER MUST APPEAR
ON ALL SHIPMENTS, INVOICES, B/L AND CORRESPONDENCE.

TO:
TRI STATE FENCE & IRONWORKS IN
660 W CARROLL STREET
DOTHAN, AL 36301

SHIP/ BILL TO:
City of Dothan
126 N. ST. ANDREWS STREET
THIRD FLOOR - ROOM 309
DOTHAN, AL 36303

DATE 12/20/18	VENDOR NUMBER	2002091	
DATE REQUIRED 12/20/18		F.O.B. DESTINATION UNLESS OTHERWISE SPECIFIED	
REQUISITIONED BY/DIRECT QUERIES TO: KIM VANN 3346154412			
FOR		DEPT.	
00127605276063			
TERMS			

FOR BILLING INFORMATION CONTACT
ACCOUNTS PAYABLE AT (334) 615 3154

NO CHANGE ON THIS PURCHASE ORDER IS AUTHORIZED WITHOUT THE WRITTEN PERMISSIOIN OF THE PURCHASING DEPARTMENT.

DESCRIPTION	UNIT PRICE	QUANTITY	AMOUNT
EMERGENCY FENCE PURCHASE	1.0000	5248.00 EA	5248.00
	SUB-TOTAL		5248.00
	TOTAL		5248.00

REMARKS:

BEASON-HAMMON ACT

"By signing this contract, grant, or other agreement, the contracting parties affirm, for the duration of the agreement, that they will not violate federal immigration law or knowingly employ, hire for employment, or continue to employ an unauthorized alien within the State of Alabama. Futhermore, a contracting party found to be in violation of this provision shall be deemed in breach of the agreement and shall be responsible for all damages resulting therefrom."

BY ACCEPTING THIS CITY OF DOTHAN PURCHASE ORDER, THE VENDOR REPRESENTS AND AGREES THAT THEY ARE NO CURRENTLY ENGAGED IN, AND AGREES; THAT THEY WILL NOT ENGAGE IN, THE BOYCOTT OF A PERSON OR AN ENTITY, BASED IN OR DOING BUSINESS WITH A JURISDICTION, WITH WHICH THE STATE OF ALABAMA CAN ENJOY OPEN TRADE.

City Purchase of Fence Around Former Substation Site adjacent to Aunt Katie's Garden

FOR DEPARTMENT USE ONLY - DEPT. HEAD SIGN & RETURN TO THE FINANCE DEPARTMENT

I CERTIFY THAT THE ABOVE MATERIAL OR SERVICES HAVE BEEN PERFORMED UNDER THE TERMS OF THIS PURCHASE ORDER.

DATE SIGNATURE

CITY OF DOTHAN
PURCHASING DEPARTMENT

BY: Charlotte Langford

PURCHASING AGENT

Lance R. LeFleur
Director

Kay Ivey
Governor

Alabama Department of Environmental Management
adem.alabama.gov
1400 Coliseum Blvd. 36110-2400 ▪ Post Office Box 301463
Montgomery, Alabama 36130-1463
(334) 271-7700 ▪ FAX (334) 271-7950

November 15, 2019

Mr. Bob Wilkerson
City of Dothan
Post Office Box 2128
Dothan, Alabama 36302

RE: Brownfields Cleanup Grant Support Letter

Dear Mr. Wilkerson:

We are pleased to support the City of Dothan in its pursuit of a Brownfields Cleanup Grant from the US Environmental Protection Agency for the Dothan Community.

We understand that the target site is a former electrical substation owned by the City. The site consists of a 0.15-acre vacant parcel of land located in an area of mixed commercial and residential use at the southeast corner of Whiddon and Linden Streets, immediately adjacent to the existing Aunt Katie's Community Garden. The property has been assessed using funding from your current Community-Wide Assessment Grant, revealing the presence of elevated concentrations of arsenic in near surface soils. Pedestrians, including children, frequently walk across the site and play on it, and the City is seeking cleanup funding to remove the impacted soils for expansion of the adjacent Community Garden. The Garden, established in 2010, was developed by the Dubois Institute for Entrepreneurship, a local non-profit organization that has dedicated itself to finding ways to close disparity gaps in the community by focusing on programs that impact lower socio-economic neighborhoods. The organization expanded its outreach to advocate against childhood obesity by launching Aunt Katie's Community Garden and Urban Farm, which has made a significant impact on the local community. Aunt Katie's Garden is located in Census Tract 406, where residents face extensive challenges when compared to national, state, and county average statistics for poverty and health.

The Department has already partnered with Dothan on various community outreach activities and looks forward to providing further assistance in these endeavors. Dothan has also requested technical assistance from the Department for the Aunt Katie's Community Garden site; however, these funds and resources are available on a first come, first served basis. Therefore, we look forward to being able to assist you where possible as this project develops.

We wish you and the residents of the Dothan Community success in the pursuit of these funds. Please let us know if we can be of further assistance.

Sincerely,

Sonja B. Favors
Industrial Hazardous Waste Branch Chief
Land Division

SBF/AME
cc: Mike McCown via email, mike.mccown@ppmco.com

ADEM interest in providing technical assistance using 128a funds

Birmingham Branch
110 Vulcan Road
Birmingham, AL 35209-4702
(205) 942-6168
(205) 941-1603 (FAX)

Decatur Branch
2715 Sandlin Road, S.W.
Decatur, AL 35603-1333
(256) 353-1713
(256) 340-9359 (FAX)

Mobile Branch
2204 Perimeter Road
Mobile, AL 36615-1131
(251) 450-3400
(251) 479-2593 (FAX)

Mobile-Coastal
3664 Dauphin Street, Suite B
Mobile, AL 36608
(251) 304-1176
(251) 304-1189 (FAX)

WIREGRASS FOUNDATION

Health | Education | Quality of Life

January 23, 2019

Mr. Michael Jackson
Dubois Institute for Entrepreneurship, LLC
P.O. Box 6102
Dothan, AL 36302

Dear Mr. Jackson:

As you know, Wiregrass Foundation has been closely following the current Brownfield's assessment project sponsored by the City of Dothan. As an organization that is always interested in innovative community partnerships, we are eager to hear the results of the study, and the plans of the City and private owners to reclaim these once viable sites.

Clearly one of the most promising properties for community development is the tract of land that is adjacent to Aunt Katie's Community Garden. We were very glad to hear that the City of Dothan is now applying for an EPA Brownfields Cleanup Grant for that site, with plans to work with Aunt Katie's Garden to extend your important mission. You have worked hard to educate this community on the importance of healthy food for all and to earn the respect of everyone with whom you have come into contact.

In recent years Wiregrass Foundation has been honored to provide partial support for several of your initiatives at the Garden. Most recently we assisted with $25,000 for construction of the education center, and we have been proud to provide support each year for your summer educational programs. Your vision for Dothan in general, and your keen focus on community food production and public awareness of opportunities and challenges facing some of our neighborhoods, have opened many eyes. Some of those eyes belong to our youngest citizens, who will now grow up knowing more about healthy food, healthy living, and the importance of sustainable land management than prior generations have ever known.

We wish you and the City every success in the EPA Brownfields Cleanup Grant competition. You have proven yourself to be a man of vision, wisdom, and commitment, and there is no limit to what Aunt Katie's Garden will be able to do given time, space, and resources.

Best of luck,

Barbara Alford

Barbara Alford, President

1532 Whatley Drive
Dothan, Alabama 36303
p 334.699.1031
w wiregrassfoundation.org

Attachment C
Threshold Criteria

THRESHOLD CRITERIA FOR CLEANUP GRANT

1. Applicant Eligibility: Dothan, AL, incorporated as a City on November 10, 1885, is a unit of local government as defined in 40 CFR Part 31.3, and is an eligible entity to receive EPA Brownfields Cleanup funding.

2. Previously awarded Cleanup Grants: Dothan has never received an EPA brownfields cleanup grant.

3. Site Ownership: The City acquired ownership of the electrical substation site on July 13, 1957 (proof of ownership attached).

4. Basic Site Information: The site is known as the "former electrical substation" site, and is located at the corner of Linden and Whiddon Streets, Dothan, AL 36303. The lot does not have a street address, but it is adjacent to Aunt Katie's Community Garden with an address of 602 Linden Street, Dothan, AL 36303.

5. Status and History of Contamination at the Site: The site consists of a 0.15-acre vacant parcel of land located in an area of mixed commercial and residential use. It is commonly known as the "former electrical substation", and is located immediately adjacent to the existing Aunt Katie's Community Garden, who plans to acquire the property after cleanup to expand of the Garden. The property was developed and used as an electrical substation by Alabama Power from 1961 until at least 1997, and has remained vacant since at least that time. Pedestrians, including children, frequently walk across the site and play on the property. Soils in the center of the property have been unable to support the growth of vegetation since the removal of the substation around 1997. Arsenic and semi-volatile organic compounds (SVOCs) were found during assessment activities at concentrations that exceed Residential Regional Screening Levels (RSLs). No polychlorinated biphenyls (PCBs) above action levels were found. Although there is no obvious use of arsenic at an electric substation, a possible explanation may be that arsenic was used to control rodents in an effort to minimize potential damage to electrical lines, or as an herbicide to control weeds. It is also possible that the arsenic is associated with use of wood products treated with copper-chromium-arsenic (CCA), which would explain the elevated SVOC concentrations as well. The primary contaminant of concern (COC) at the site is arsenic, which is likely above RSLs over the entire property to a depth of 4 feet. There is the potential for dermal, inhalation and ingestion of contaminants by local residents and workers at the Garden once it expands onto the property. The area of impact is estimated at approximately 7,000 square feet to a depth of 4 feet. Refer to the draft Analysis of Brownfields Cleanup Alternatives (ABCA) for a more detailed description of the site history and contamination.

6. Brownfields Site Definition: The site is not listed or proposed for listing on the National Priorities List; is not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA; and is not subject to the jurisdiction, custody, or control of the U.S. government.

7. Environmental Assessment Required for Cleanup Proposals: A Phase I Environmental Site Assessment (ESA) was conducted at the site (report date of February 26, 2018) and a Phase

II ESA (report date of September 17, 2018) using funds from an EPA Brownfields Community-Wide Assessment Grant awarded to Dothan in 2017. The Phase II ESA revealed the presence of arsenic and SVOC- impacted soils at the site.

8. Enforcement or Other Actions: There are no ongoing or anticipated environmental enforcement actions related to the brownfield site for which funding is requested. There also are no inquiries or orders for federal, state, or local government entities that we are aware of regarding the responsibility of any party (including the City) for the hazardous substances at the site.

9. Property-Specific Determination Information: This site does not require a Property-Specific Determination.

10. Threshold Criteria Related to CERCLA/Petroleum Liability

a. Property Ownership Eligibility – Hazardous Substance Sites

CERCLA Liability Exception Status (Site Acquired Prior to January 22, 2002)

Dothan's eligible for brownfield cleanup grant funding as we qualify for **CERCLA Liability Exception Status** under Section 7 of the BUILD Act because the property was acquired prior to January 11, 2002. Supporting information is as follows:

- The property was acquired from Alabama Power Company on July 13, 1957 as a part of a multi-parcel transaction involving similar lots throughout the City.
- The City of Dothan never conducted any operations at the site. The electrical substation was built by Alabama Power Company in 1961, operated until approximately 1997, and dismantled in approximately 2003. No releases were ever reported at the site, and impact was first discovered during the Phase II ESA conducted in September 2018. The City of Dothan did not cause or contribute to the release or disposal of hazardous substances at the site.
- Dothan has never arranged for the disposal of any hazardous substances from the site, nor transported hazardous substances to the site.

Based on this information, Section i, *Exemptions to CERCLA Liability*; Section ii, *Exceptions to Meeting the Requirements for Asserting an Affirmative Defense to CERCLA Liability*; Section iii; *Landowner Protections from CERCLA Liability* do not apply.

11. Cleanup Authority and Oversight Structure:

a. Describe how the City will oversee the cleanup of this site. A draft analysis of brownfield cleanup alternatives (ABCA) that presented several cleanup alternatives to address the impacted soils at the site was developed. The recommended alternative, based on the findings from the Phase II ESA and discussions with the Alabama Department of Environmental Management (ADEM), includes excavation and landfill disposal of shallow soils impacted by arsenic and SVOCs, followed by engineering and institutional controls. The City has significant experience with retaining technical expertise to assist with complex projects, and will retain a qualified Environmental Professional firm to develop a corrective action plan and cleanup the site. The City

will ensure that all procurement actions are undertaken in accordance with City, state and federal procedures, including the competitive procurement provisions of 2 CFR 200.317 through 200.326. The recommended cleanup will consist of the following:

- Collection of additional samples (using current assessment grant funds, and possibly resources from the Alabama Department of Environmental Management [ADEM]) to determine naturally occurring (background) arsenic concentrations and to further delineate the area requiring excavation.
- Entry of the site into the ADEM Voluntary Cleanup Program (VCP).
- Preparation of bid documents for the proposed excavation and solicitation of bids from qualified contractors.
- Excavation of the upper 2 feet of soils across the 0.51-acre site; segregation of materials into distinct units, and waste characterization of excavated materials to determine landfill disposal options.
- Collection of confirmation samples from the base and sidewalls of the excavation.
- Transportation of the soils to an approved landfill for disposal.
- Placement of a witness barrier to establish a visible boundary between soils greater than 2 feet deep and the clean backfill material.
- Backfilling of the excavation with clean, imported fill and a layer of topsoil, and reseeding with grass.
- Preparation of a final report and placement of restrictive covenants (if required).

To reduce disposal costs, steps will be taken to segregate hazardous soils from non-hazardous soils. The distribution of detected arsenic concentrations were evaluated across the site to estimate the potential volume of soils that would be considered hazardous. Excavation of metal-impacted soils is a common method of cleanup, and the City is confident in the effectiveness and plausibility of the proposed cleanup method.

b. Cleanup response activities: Since the City already owns the property, access to adjacent properties will not be required. However, a community meeting will be held prior to conducting excavation activities to inform area residents of the construction activities and to address any concerns that may be raised. Two public meetings have already been held to announce the project. The entire work area has already been secured with fencing.

12. Community Notification:

a. Draft Analysis of Brownfield Cleanup Alternatives (ABCA): A copy of the draft grant application, along with a draft ABCA was provided for review at November 13, 2019 public meeting, as well as instructions on where the documents can be reviewed by others prior to submittal of the proposal.

b. Community Notification Ad: The City provided public notification that meet all EPA requirements regarding intent to apply for this cleanup grant via three methods. Two community meetings were held in the target community at *Aunt Katie's Community Garden*. The most recent community meeting was held on November 13, 2019 at 10:00 am. This event was advertised on the Community Garden's Facebook page, and proof of this notification is attached. In addition, Alan

Rockwell, a well-known and respected employee for the City of Dothan Building Inspection Department who has built great relationships with residents of the target community, went door-to- door in the neighborhood to inform the community of the meeting. A community meeting was also held on January 8, 2019 regarding the project, and proof of that notification is also attached.

c. Public Meeting: The public meeting was held on November 13, 2019 at 10:00 am at the adjoining Aunt Katie's Community Garden education building to receive and address public comments. A copy of the draft grant application, along with a draft ABCA was provided for review at this meeting, as well as instructions on where the documents can be reviewed by others prior to submittal of the proposal.

d. Community Notification Documents: Proof of the advertisement for the community meeting, meeting notes, sign-in sheet, questions asked and responses, and a copy of the draft ABCA is attached. No written questions were received.

13. Statutory Cost Share: Dothan understands that we are required to provide a 20% cost share for the total federal cleanup funds awarded in the form of a contribution of money, labor, material, or services from a non-federal source. Total clean-up costs are estimated at $356,400. Dothan is requesting $297,000 from the EPA for the cleanup grant, and the Dothan City Council has already passed a resolution (draft attached) committing $59,400 to meet the required 20% cost share. This cost share will be met by providing the following:

- In-kind services, consisting of:
  - City equipment operator ($35/hr x 40 hrs. = $1,400)
  - City equipment ($55/hr x 40 hrs. = $2,200)
  - Disposal of non-hazardous soils in City landfill ($12.50/ton x 300 tons = $3,750)
- Payment of $31,960 to the Alabama Department of Environmental Management (ADEM) for entry into the Voluntary Cleanup Program.
- Payment of $20,090 to the selected Environmental Professional for cleanup services.

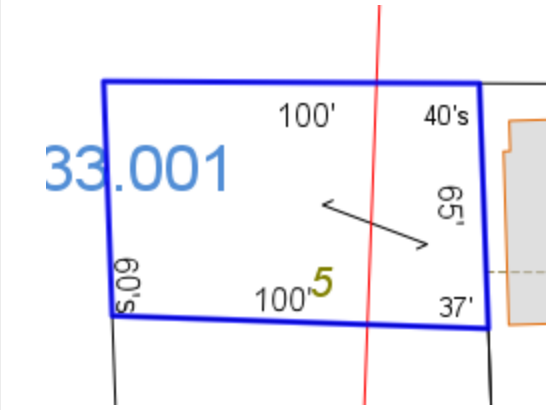
These items are all eligible to meet the required $59,400 cost share. A hardship waiver for the cost share is not being requested.

Proof of Site Ownership

Houston County Alabama - 2018

Property Record Card

Print Close



Parcel Info

Parcel Number			Delta Pin #	Exempt	
0906144007033001			18787		AMENTITES ROAD TOPO SEWER WATER GAS
Subdivision	NORTHWEST HILL				
Neighborhood	111				
District	**City**	**S-T-R**	**Acreage**	**Lot Size**	**Deed B/P/D**
03	Dothan	14-3N-26E	0		--0/0/0
Brief Description	LOT 5 BLK 1 NORTHWEST HILL SUB				

Owner

Name	DOTHAN CITY OF		
Mailing Addr	P O BOX 2128 DOTHAN, AL 36302	**Physical Addr**	0 WHIDDON ST

Values

Land Total:	**$2,300.00**
Building Total:	**$0.00**
Appraised Value:	**$2,300.00**
Yrly Tax:	**$0 for 2018**

Tax History

Tax Year	Date Paid	Amount Paid
2018	//	**$0.00**
2017	//	**$0.00**
2016	//	**$0.00**
2015	//	**$0.00**


Former Electrical Substation Site,
Corner of Whiddon and Linden Street,
Dothan, AL
Site (no address)
Walnut St
Whiddon St
Whiddon St
N Bell St
N Alice St
Chickasaw St
Montana St
Linden St
Blackshear St
N Bell St
Lee Alley
New Hope Ln
Atlanta St
W Powell St

SUBSTATIONS BOUGHT FROM
ALABAMA POWER

Return L R Driggers
City Clerk $6.85
Dothan Ala

JUL 13 10 05 AM '57

STATE OF ALABAMA)
JEFFERSON COUNTY)

I, Mary J. Cochran, Assistant Secretary of Alabama Power Company, do hereby certify that the following is a true and correct copy of an excerpt from the minutes of a meeting of the Board of Directors of said Company duly called and held at the office of the Company in the City of Birmingham, Alabama, on the 15th day of March, 1957, a quorum of the Board being present, viz:

> After discussion of the matter, the officers were duly authorized on behalf of the Company to enter into negotiations with the City of Dothan for the sale of certain substations owned by the Company which are located in such municipality.

Given under my hand and the seal of said Company at its office in the City of Birmingham, Alabama, on this the 5th day of July, 1957.

Mary J. Cochran
Assistant Secretary,
Alabama Power Company.

This is an indenture entered into as of the 9th day of July, 1957 by and between ALABAMA POWER COMPANY, a corporation organized and existing under the laws of the State of Alabama and the CITY OF DOTHAN, a municipal corporation of the State of Alabama.

For and in consideration of the mutual agreements herein contained and in consideration of One Hundred Fifty-one Thousand Four Hundred Eighty-three Dollars ($151,483) to ALABAMA POWER COMPANY in hand paid by the CITY OF DOTHAN, the receipt of which is hereby acknowledged, the said ALABAMA POWER COMPANY does hereby grant, bargain, sell and convey to the CITY OF DOTHAN, its successors and assigns, certain electrical properties consisting of real and personal property in such City of Dothan and more particularly described as follows:

I

That certain 7500 KVA, 44/4.16 KV transformer substation known as the College Street Substation of Alabama Power Company, consisting of facilities now installed on lands of the City of Dothan near the water and light plant building of such City on College Street in such City and including the following equipment:

37 cu. yds. Foundation, Concrete, for transformer mat, transformer cooling fans, steel structure and old transformer mat and extension for oil circuit breaker.

17,000 lbs. Steel Structure, galvanized, all except extension for capacitors.

200 ft. Fence, complete, Hog and Cattle, galvanized.

All Bus, Low Voltage, $\frac{1}{4}$" x 6" copper, complete with supports and connectors.

250 ft. Bus, High Voltage (46 KV) 250 MCM copper cable.

90 Insulators (high voltage bus) 10" susp. type.

3 Lightning Arresters, 40 KV, G.E.Co. Thyrite.

All Ground Bus (2/0 copper).

4 Transformers, Moloney, 2500 KV, 44000/2400 volt S/N 890549-50-51-52.

6 Fans, transformer cooling.

1 Oil Circuit Breaker, Westinghouse, 1200 amp. 14.4 KV Type GO-2B, S/N 18Y8352.

All oil circuit breaker controls, relays, panel, etc., as per Exhibit "A" Sheet #2.

6 Switches, disconnect, 7.5 KV, 1200 amp. SPST, USCO Type HT.

1 Switch, gang operated air break, 7.5 KV, 1200 amp. USCO.

There are excepted from this grant certain facilities of Alabama Power Company located at such transformer station consisting of the two 44 KV oil circuit breakers, the 4160 volt metering equipment and 4160 volt capacitors and the facilities related thereto. The facilities conveyed and the excepted facilities are more fully described by reference to drawings attached hereto marked Exhibit "A", Sheets 1 and 2, and identified on behalf of Alabama Power Company by E. C. Easter, its Vice President, and on behalf of the City of Dothan by R. C. McClintock, President of its Board of Commissioners, and made a part hereof, the facilities being retained by Alabama Power Company being shown by yellow coloring on such Exhibit "A".

II

That certain 7500 KVA, 44/4.16 KV transformer substation, including the real estate upon which such substation is located, known as the Whiddon Street Substation of Alabama Power Company, now located on Whiddon Street in the City of Dothan and consisting of the following equipment:

216 ft. Fence, Keystone, 60" high, complete.

15 cu. yds. Foundation, concrete.

5223 lbs. Steel Structure, galvanized.

4 Transformers, Allis-Chalmers, 2500 KVA, 46200/2520 volts S/N 2,392,544-45-46-47.

1 Fuse and Switch combination - 46 KV.

All Grounding System.

All High Voltage Bus.

All Low Voltage Bus.

The tract of land on which such Whiddon Street Substation is located and which is conveyed hereby is described as follows:

A plot of land in the City of Dothan, Alabama, described as follows: Beginning at a point where the south boundary line of Whiddon Street intersects the east boundary line of Linden Street, also known as Atlanta Street, and running southward along the east boundary line of said Linden or Atlanta Street a distance of 100 feet, to a point, thence turn an angle of 86° 00' to the left and run a distance of 88 feet to a point, thence turn an angle of 94° to the left and run parallel with the east boundary line of Linden or Atlanta Street a distance of 100 feet to the south boundary line of Whiddon Street, thence in a westerly direction along the south boundary line of Whiddon Street a distance of 88 feet to the point of beginning and being a part of Lots 4 and 5, in Block 1, of the Northwest Hill Addition to the City of Dothan, Alabama, according to the map thereof, recorded in the office of the Judge of Probate of Houston County, Alabama, in Deed Book 1, page 590.

There is excepted from this grant the 4160 volt metering equipment of Alabama Power Company as presently installed at such Whiddon Street Substation.

III

That certain 4500 KVA, 44/4.16 KV transformer substation, including the real estate upon which such substation is located, known as the South Dothan Substation of Alabama Power Company, now located on Pettus Street in the City of Dothan and consisting of the following equipment:

232 ft. Fence, Keystone, 60" high, complete.

31 cu. yds. Foundation, concrete.

5023 lbs. Steel Structure, galvanized.

3 Transformers, Westinghouse, 1500 KVA, 44000/2400 volts, S/N, 661283-84-85.

1 Transformer, Pittsburgh, 1500 KVA, 44000/2400 volts S/N 707278.

1 Fuse and Switch combination, USCO, 46 KV.

All Station Grounding System.

All High Voltage Bus.

All Low Voltage Bus.

The tract of land on which such South Dothan Substation is located and which is conveyed hereby is described as follows:

A plot of land located in the City of Dothan, Houston County, Alabama, more particularly described as follows: Commence at the intersection of the south boundary of Selma Street and west boundary of Pettus Street, and run southerly along the west boundary of Pettus Street for a distance of 404.33 feet to a point; said point being the point of beginning of the parcel or lot of land herein described. From said point of beginning, continue to run southerly and along the west boundary of Pettus Street for a distance of 75.00 feet to a point, thence turn an angle of 89° 34' to the right and run westerly for a distance of 156.29 feet to a point on the east boundary line of the Central of Georgia Railroad right of way, thence turn an angle of 87° 20' to the right and run northerly along the east boundary line of the Central of Georgia Railroad right of way for a distance of 75.08 feet to a point, thence turn an angle of 92° 40' to the right and run easterly for a distance of 160.35 feet to the point of beginning.

There is excepted from this grant the 4160 volt metering equipment of Alabama Power Company as presently installed at such South Dothan Substation.

Alabama Power Company shall have the right to maintain, operate, replace and remove the excepted facilities described in I, II and III above

together with the right of ingress and egress to and from such facilities for such purposes.

All property described in I, II and III above is subject to the lien of the mortgage indenture of Alabama Power Company to Chemical Corn Exchange Bank, as Trustee, dated January 1, 1942, as amended and supplemented; Alabama Power Company agrees to obtain a release of such property from such lien within a period of ninety (90) days from the date hereof.

TO HAVE AND TO HOLD unto the CITY OF DOTHAN, Alabama, its successors and assigns, forever.

And ALABAMA POWER COMPANY does for itself, its successors and assigns, hereby warrant that it has a good right to sell and convey the property hereinabove described, that such property is free from all encumbrances, except as above stated and except for the lien of ad valorem taxes for the year 1957 due and payable October 1, 1957; that it will warrant and defend the same against the lawful claims of all persons; it being understood, however, that the description of quantities of substation equipment in place has been necessarily made by estimation in some cases and the exact listed quantities are not guaranteed by ALABAMA POWER COMPANY.

The CITY OF DOTHAN acting by duly adopted resolution of its Board of Commissioners has authorized the acceptance of, and does hereby accept the property hereinabove described as conveyed to it and assumes all responsibility therefor from and after the date hereof.

IN WITNESS WHEREOF, the parties hereto have caused this indenture to be executed and their corporate seals to be affixed and attested, all by proper officers duly authorized as of the date first written above.

ALABAMA POWER COMPANY

ATTEST:

Secretary

By E. P. Porter
Vice President

CITY OF DOTHAN

ATTEST:

Clerk

By Richmond McClintock
President of Board of Commissioners

STATE OF ALABAMA)
)
JEFFERSON COUNTY)

I, Lillian Hadnot, a Notary Public in and for said County, in said State, hereby certify that E. C. Easter whose name as Vice President of Alabama Power Company, a corporation, is signed to the foregoing indenture, and who is known to me, acknowledged before me on this day that, being informed of the contents of the indenture, he, as such officer and with full authority, executed the same voluntarily for and as the act of said corporation.

Given under my hand and official seal, this 8th day of July, 1957.

Lillian Hadnot
Notary Public

STATE OF ALABAMA)
)
HOUSTON COUNTY)

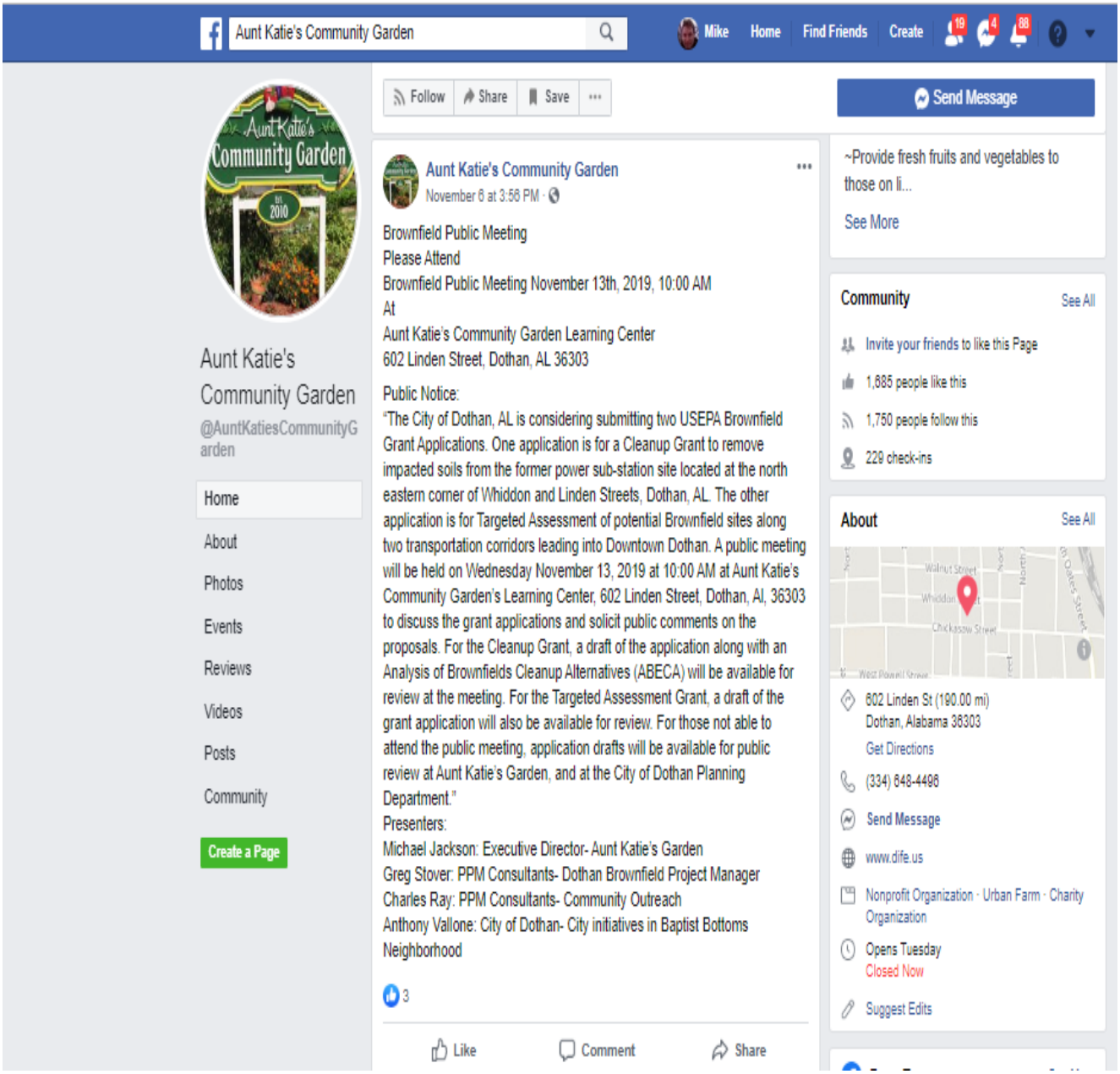
I, Ann L. Miller, a Notary Public in and for said County, in said State, hereby certify that Richmond C. McClintock whose name as President of Board of Commissioners of the City of Dothan, a municipal corporation, is signed to the foregoing indenture, and who is known to me, acknowledged before me on this day that, being informed of the contents of the indenture, he, as such officer and with full authority, executed the same voluntarily for and as the act of said corporation.

Given under my hand and official seal, this 9th day of July, 1957.

Ann L. Miller
Notary Public

Community Notification Documents ***(proof of advertisement, public meeting minutes, articles, sign-in Sheet, draft ABCA)***

Proof of Public Notice for Community Meeting



BH MEDIA GROUP Publishing Solutions
A Berkshire Hathaway Company

Order Confirmation
Ad# 0001130736-01

Alabama Community Newspapers

Client: CITY OF DOTHAN
Client Phone 3346153161

Account #: 2150038
Address:
PO BOX 2128
DOTHAN AL 36302

Fax:
EMail chcamp@dothan.org

Payor Customer: CITY OF DOTHAN
Payor Phone 3346153161

Payor Account: 2150038
Payor Address:
PO BOX 2128
DOTHAN AL 36302

Ordered By wallman
Sold By wallman

Total Amount $136.00
Payment Amount $0.00
Amount Due $136.00

Status:
Materials:

Tax Amount: 0.00
Payment Metho Invoice - Statement
PO Number L7600 USEPA Brownfie
Order Notes: L7600 USEPA Brownfields Cleanup Grant Mtg 1/8/19
Invoice Text: L7600 USEPA Brownfields Cleanup Grant Mtg 1/8/19

Ad Number **0001130736-01**

Ad Type CLP Legal Liner
Color $0.00
Pick Up Number
Ad Size 1 X 18 li
Production Method AdBooker (liner)
Production Color
Production Notes

Ad Content Proof

Note: Ad size does not reflect actual ad

L7600 City of Dothan
Notice of Public Meeting

The City of Dothan, AL is considering submitting a USEPA Brownfields Cleanup Grant proposal to remove impacted soils from the former power sub-station site located at the north eastern corner of Whiddon and Linden Streets, Dothan, AL. A public meeting will be held on Tuesday, January 8th, 2019 at 10:30 AM at Aunt Katie's Community Garden's Learning Center, 602 Linden Street, Dothan, Al, 36303 to discuss the grant application and solicit public comments on the proposal. A draft proposal with an Analysis of Brownfields Cleanup Alternatives will be available at the meeting, and for public review following the meeting at Aunt Katie's Garden, and at the City of Dothan Planning Department.

Product and Zone	Placement	Position	# Inserts
Run Schedule Invoice Text			
ALA Dothan Eagle CLP	_Legal Ads	_Legal Notices	1

L7600 USEPA Brownfields Cleanup Grant Mtg 1/8/19

Run Dates
12/21/2018

TagLine: L7600 USEPA BROWNFIELDS CLEANUP GRANT MTG 1/8/19

Product and Zone	Placement	Position	# Inserts
Run Schedule Invoice Text			
ALA AffidavitFee	_AffidavitFee-DOT		1

L7600 USEPA Brownfields Cleanup Grant Mtg 1/8/19

Run Dates
12/21/2018

TagLine: L7600 USEPA BROWNFIELDS CLEANUP GRANT MTG 1/8/19

Product and Zone	Placement	Position	# Inserts
Run Schedule Invoice Text			
ALA dothaneagCLP.com	_Legal Ads	_Legal Notices	1

L7600 USEPA Brownfields Cleanup Grant Mtg 1/8/19

Run Dates
12/21/2018

TagLine: L7600 USEPA BROWNFIELDS CLEANUP GRANT MTG 1/8/19

https://www.dothaneagle.com/news/government/city-seeks-to-aid-aunt-katie-s-garden-expansion-through/article_b4f43685-c1a7-5d54-825f-d4371ab31c5c.html

City seeks to aid Aunt Katie's Garden expansion through another Brownfields grant

By Jeremy Wise jwise@dothaneagle.com Nov 8, 2019

The city of Dothan plans to pursue another Environmental Protection Agency Brownfields Program grant to help Aunt Katie's Garden expand.

This week, the Dothan City Commission authorized Mayor Mark Saliba to execute the documents needed to apply for and obtain the grant, which helps rehabilitate properties that could potentially have environmental hazards in hopes of spurring economic development projects.

Aunt Katie's Garden, which provides educational and entrepreneurial opportunities through growing vegetables and fruits, lies adjacent to an empty lot, and the garden's executive director has expressed a desire to purchase the lot to expand the garden.

A previous EPA brownfields grant Dothan received led to an assessment that indicated the lot, which housed an old electrical substation, contained elevated levels of arsenic. City personnel fenced off the area at Whiddon and Linden streets to prevent any further exposure until it can be rehabilitated.

The new grant seeks up to $297,000 for cleanup efforts. City contractor PPM Consultants has recommended the excavation of the lot and the installation of protective barriers to remediate the issue, a city report says.

READ MORE »

PPM also suggested Dothan officials could include a groundwater investigation to

ensure runoff from the current property is not adversely affecting local streams.

If the grant is awarded, the city would have to match 20% of the total — $59,400 at most. The city can count in-kind services toward that amount.

City officials will hold a public meeting regarding the project at 10 a.m. Wednesday at Aunt Katie's Garden. The meeting will allow residents to offer input on or ask questions about the initiative.

The garden is at 602 Linden St.

Jeremy Wise

Brownfields Public Outreach Meeting- November 13, 2019

Aunt Katies Garden 602 Linden St. Dothan, Alabama 36303

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Bob Williamson		City-Dothan

Meeting Notes

Brownfield Public Meeting- November 13, 2019

Aunt Katie's Community Garden, 602 Linden Street, Dothan, Alabama

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The Meeting was opened at 10:00 AM in the Education and Learning Center at the Garden. Bob Wilkerson, City of Dothan Brownfield project leader introduced the speakers.

Mr. Michael Jackson, Executive Director of Aunt Katie's Community Garden welcomed the audience to the Gardens. He provided a brief history of the almost 10-year existence of the non-profit operation. He shared his goals and objectives as well as his need for the City to be able to conduct clean-up of the adjacent lot so that he can expand production and become financially sustainable. Mr. Jackson provided a handout article describing how development is occurring around a community garden operation in Detroit Michigan. Mr. Jackson has a strategic plan to make a similar outcome around Aunt Katies Garden in Dothan. Article attached

Mr. Charles Ray, Community Outreach Specialist for PPM Consultants provided comments regarding both the importance and value of public engagement. He also shared thoughts regarding a valuable working relationship between community garden operations in Florida and Publix grocery markets. He agreed to follow-up with contacts in Florida and USDA that may be able to help coordinate a similar arrangement for Aunt Katie's Garden.

Mr. Greg Stover, Senior Project Manager for PPM Consultants, provided a PowerPoint summary and overview of the assessment process that lead to the need for clean-up funds and subsequent clean-up application. In addition, he shared a brief of the milestone achievements of the Assessment Grant Project which include 10 Phase I investigations, 4 Phase II investigations, and two-Phase III actions , most of which has been achieved in the first 24 months of the project life. Mr. Stover reported that since the City of Dothan has expended nearly 80% of the assessment grant funds, that EPA has declared Dothan eligible to apply for another round of Assessment Grant funds in the current 2020 grant application cycle. He explained the general target area for the new assessment project as "transportation corridors impacting the redevelopment of Downtown Dothan". A copy of Mr. Stover's PowerPoint is attached.

Mr. Mike McCown, Principal, PPM Consultants addressed the audience with an overview addressing the reasons that EPA developed the brownfield program, and how it operates as a helping program vs an enforcement program. MR. McCowan shared information regarding the highly competitive nature of the grant application process. He also provided a brief explanation of the clean-up process anticipated for Aunt Katie's Garden.

A number of questions / issues were raided by the audience including:

A question regarding the amount of remaining funds under the assessment grant. Greg Stover replied and quantified those funds were committed to ongoing tasks for an approved phase III at one site. He recommended the citizen contact Bob Wilkerson at the City to enter the site into the City's Brownfield inventory. Wilkerson interjected that a Property Access Agreement will be required to enter the inventory.

A question was asked regarding the extent of contamination at the former sub-station site. Mr. Stover answered, providing the audience with key findings at the site and the proposed plan for remediation.

A question was asked regarding the Former fertilizer brownfield site on Burdeshaw Street. Bob Wilkerson answered explaining that the site is not a part of the assessment project. He added that the site, owned by Exxon and others, is under a special clean-up order under the control of EPA. He added that owners have recently completed removal of contaminated soil, backfill with clean soil and covered with sod. The citizen stated concerns that someone was proposing to place an apartment complex on the site. Wilkerson responded that he had no knowledge of that and offered to provide a contact for the site if anyone wanted to question owners.

A question was asked regarding the final disposition of property ownership for the clean-up site after remediation. Wilkerson answered that it could be a lease or sale to Aunt Katie's Garden. Mr. Jackson responded that he desires to own the property. Wilkerson responded that review and guidance by an experienced brownfield attorney is needed to advise the City regarding options for disposing of the property.

There being no further questions or comments, the meeting was adjourned by Mr. Wilkerson at 11:15 AM.

Bob Wilkerson
City of Dothan

City of Dothan hopes to land EPA grant to remove arsenic from Linden Street lot

Jeremy Wise
jwise@dothaneagle.com

Updated Jan 8, 2019

Michael Jackson of Aunt Katie's Community Garden outlines his vision for further expansion of his facility to an adjacent lot. The lot is currently being evaluated and could be further remediated through the help of an Environmental Protection Agency Brownfields grant.

Though unacceptable levels of arsenic have been identified on a Linden Street lot the City of Dothan owns, a contractor says a "simple" project will correct the issue.

Mike McCown of PPM Consultants discussed the project during a public meeting at Aunt Katie's Community Garden Tuesday. The city conducted the meeting as part of its application for an Environmental Protection Agency Brownfields cleanup grant that officials hope to use to remediate the lot.

Officials identified a strong arsenic presence on the lot, which housed an Alabama Power electrical substation from the late 1950s through 1997, through a Brownfields assessment grant the city secured in 2017, said Greg Stover, a PPM geologist. Brownfields grants provide money to help landowners or developers interested in economic development opportunities to identify and correct any environmental concerns that could provide hurdles to projects.

"Our job is to take that vacant lot and make it something productive for the community," McCown said.

His company and the city propose to remove a few feet of the topsoil, install a plastic liner called a "witness barrier," and then replace the top layer with clean soil. A variety of factors, including the absence of buildings, makes the project easier compared to other Brownfields remediation efforts.

"This is a simple cleanup process," he said.

The City of Dothan evaluated the lot it owns at the corner of Linden and Whiddon streets as part of an idea to help Aunt Katie's Community Garden to expand. The garden provides educational and entrepreneurial opportunities through its various facilities at the corner of Linden and Chickasaw streets.

Since the Linden Street lot served as the site of an electrical substation, officials believed the ground could have had the presence of PCBs –polychlorinated biphenyls – that help transformers operate, McCown said. In an unexpected twist, scientists discovered very low (and acceptable) levels of PCBs throughout the property, but a higher level of arsenic than acceptable at every boring.

McCown said he and other officials theorize the high levels of arsenic stem from the usage of herbicides to keep the substation free of vegetation throughout the years. It is unlikely that nearby residents could have been adversely affected by the presence of contaminant since arsenic, a naturally occurring element, does not move easily unless it reaches the groundwater, McCown said.

The Dothan City Commission authorized the city's planning department to pursue a $260,000 Brownfields grant to remediate the lot in November. Should the city receive the grant, the remediation work will take about a week to complete, McCown said.

In the interim, the city has ordered fencing that will be installed to protect residents from any potential exposure, said Bob Wilkerson, a long-range planner with the City of Dothan.

Follow Jeremy Wise on Twitter @DEwiseTrojan.

Public meeting organized to discuss remediation of contaminated lot on Linden Street

Jeremy Wise
jwise@dothaneagle.com

Jeremy H Wise
Jan 7, 2019

After discovering a lot located at the corner of Linden and Whiddon streets contains environmental contaminants, the City of Dothan is ready to fix the problem.

City officials found that the lot, which is adjacent to Aunt Katie's Community Garden, contains contaminants; it's now part of an Environmental Protection Agency Brownfields grant project. Brownfields grants provide money to help clean parcels of land that could be used for economic development.

The city owns the lot, which was once the site of an electrical substation. Once remediated, officials have expressed an interest in helping Aunt Katie's Community Garden expand, which could provide economic development and agri-tourism opportunities, as well as more fresh fruits and vegetables to a poorer section of Dothan.

As part of the grant process, the city must call for a public meeting to discuss the project and remediation options, said Bob Wilkerson, a long-range planner with the city. The meeting to discuss this particular project will be today at 10:30 a.m. at the garden located at 602 Linden St.

After conducting the study, city officials are considering excavating the top layers of soil believed to be contaminated, Wilkerson said. After that soil is removed, the city will install a protective barrier before adding a layer of clean soil in its place.

Additionally the city could consider the installation of a top layer of asphalt with more dirt placed on top of it "out of abundance of caution," Wilkerson said, but Alabama Department of Environmental Management officials said the move is not necessarily needed. Wilkerson said Aunt Katie's Community Garden co-founder/executive director Michael Jackson plans on installing raised garden beds in tunnel houses on the property, which could negate the need for the asphalt layer.

Follow Jeremy Wise on Twitter @DEwiseTrojan.

Dothan Brownfields Assessment Grant Update & Cleanup Grant Application

Community Outreach Meeting

November 13, 2019

PART 1
Brownfield Assessment Grant

Grant Facts

- EPA Community-wide Brownfields Assessment Grant
- $300,000 awarded
- 3-year period (September 2017-2020)
- For assessing potential brownfield sites and cleanup planning
- 82% Expended at 24 months
- Focused inside Ross Circle
- Can be used for both city and private property

What is a Brownfield?

- A real property, the expansion, redevelopment, or reuse of which may be complicated by the presence or potential presence of a hazardous substance, pollutant, or contaminant.

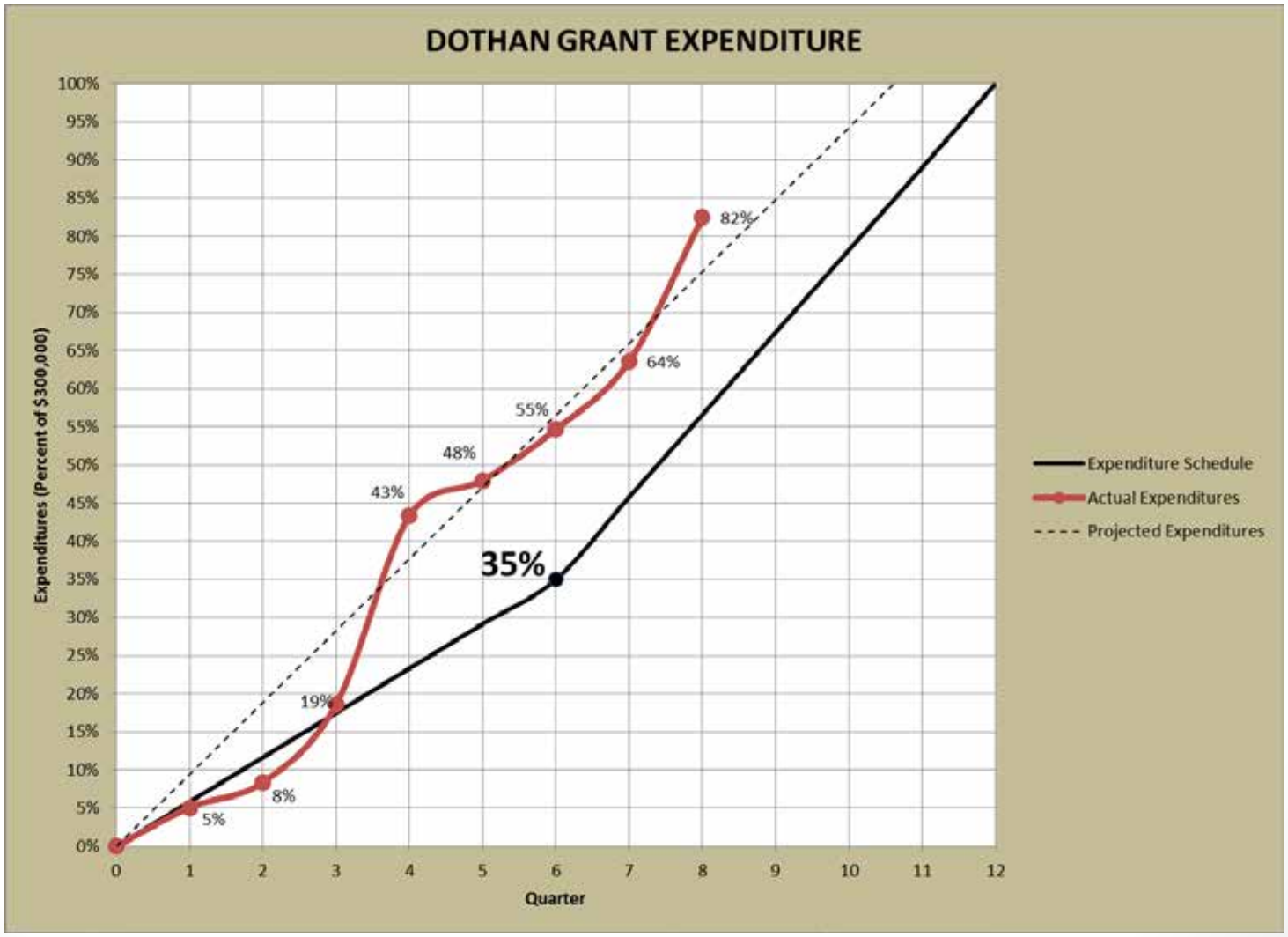
Assessment Activities

- Phase I Environmental Site Assessment (ESA)
  - Existing data gathering
- Phase II ESA
  - Quality Assurance Project Plans (QAPP)
  - Sampling: soil, groundwater, asbestos, lead-paint, etc.
- Analysis of Brownfields Cleanup Alternatives (ABCA)
- Other Possible Activities
  - Alabama Risk-based Corrective Action (ARBCA)
  - Corrective Action Plan (CAP)

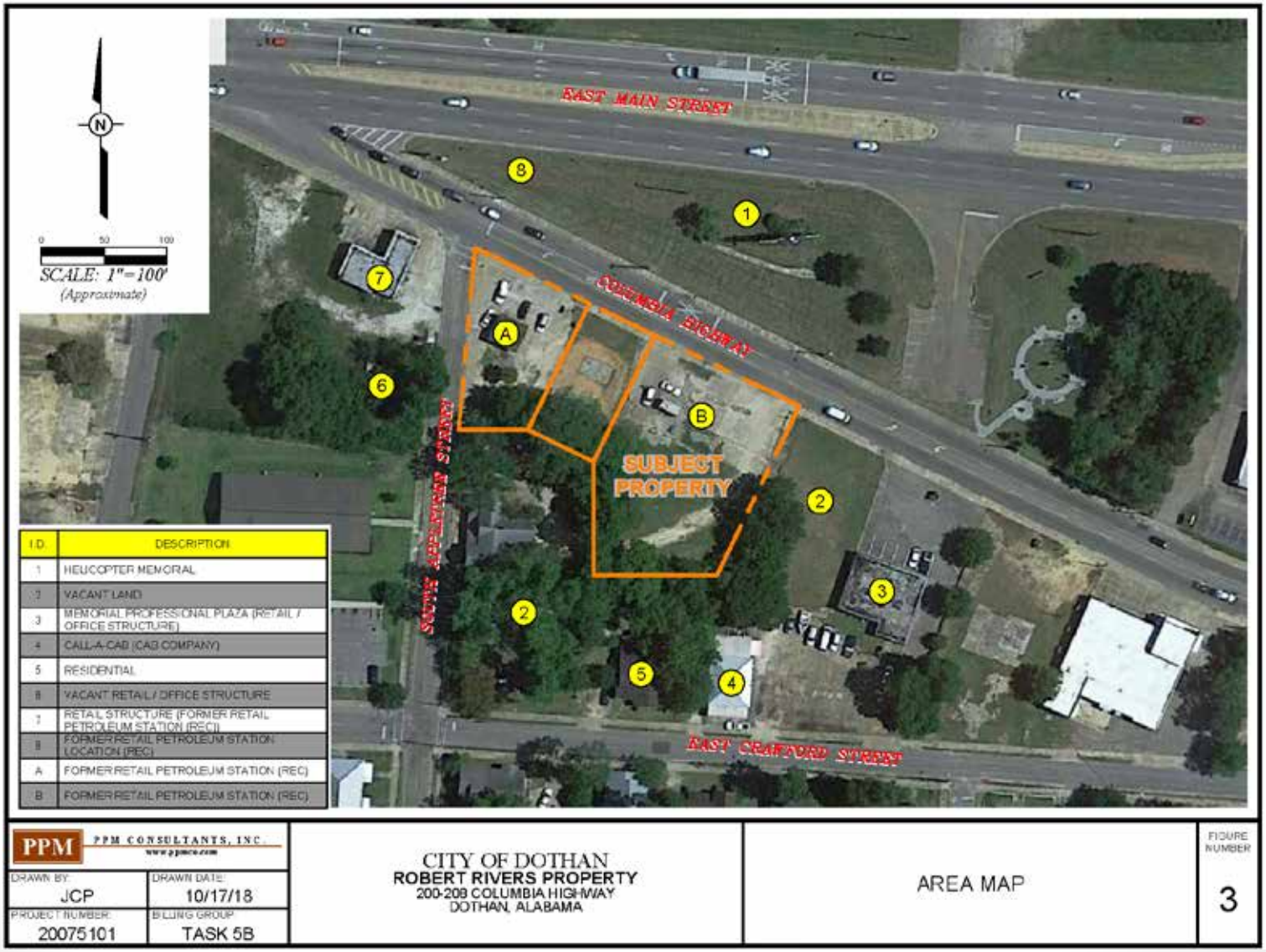
Tasks Completed in Year 2

- Three Phase I ESAs Completed
  - Milk & Ice Cream Warehouse (601 North Foster Street)
  - Former City Shop (1110 Columbia Hwy.)
  - Former Discount Cleaners (801 West Powell Street)
- Three Phase II/III ESAs Completed
  - Robert Rivers Property (200-208 Columbia Hwy.)
  - Former Discount Cleaners
  - Milk & Ice Cream Warehouse (for DDRA outside the Grant)
- Two ABCAs Completed
  - Aunt Katie's Garden (aka Former Electrical Substation)
  - Former Discount Cleaners
- SSQAPP for Swiss Cleaners Phase III submitted for EPA review
- $247K (82%) of Grant Expended

Expenditure Goal



Example Site: Robert Rivers Property



Robert Rivers Assessment

- Three contiguous parcel owned by Robert Rivers
- Both East and West Parcels Gas Stations before 1980
- Phase I ESA (2018)
  - 2 onsite and 2 offsite Gas Stations
- Phase II ESA (2018)
  - Ground Penetrating Radar (GPR) Survey to confirm UST locations
  - 15 Soil Borings/Temporary Wells
  - Analysis for VOCs, PAHs, and RCRA Metals
- Phase II ESA (2019)
  - Removed 3 USTs on West Parcel
  - Tank pit soil sampling
  - UST closure report

Year 3 Projections

- Former Swiss Cleaners
  - Phase III in January 2020
  - Possible ABCA about April 2020
- Community Outreach Meetings
  - November 2019
  - June 2020
- Finishing Reports in Progress
  - Robert Rivers Phase III ESA in November 2019
  - Former Discount Cleaners ABCA in October 2019
- Projected Completion of Expenditures
  - About June 2020
- New Grant Award Announcements in July 2020 – begin October 2020
  - 2nd Assessment Grant
  - Cleanup Grant for Former Electrical Substation

PART 2
Cleanup Grant
Public Notice

Former Electrical Substation

Summary

- Planned extension of Aunt Katie's Garden
- Electrical substation since 1940s or 50s
- Land owned by City Utility Department since 1957
- Operated by Alabama Power until late 1990s
- Phase I ESA REC = Potential release of PCBs to shallow soil (HAZ)
- Phase II ESA Findings
  - Groundwater not encountered above 40 feet BGS
  - PCBs <RSLs in 2 of 18 samples
  - PAHs >RSLs in 1 of 18 samples
  - Arsenic >RSLs in 16 of 18 samples and all 9 soil borings
- Installed Security Fence Around Property
- Cleanup Application in 2018 – not awarded
- Cleanup Application Debrief in 2019

Area Map


WHIDDON STREET
LINDEN STREET
SUBJECT PROPERTY
1
2
3
N
SCALE: 1"=60'
(Approximate)
SOURCE: GOOGLE EARTH
I.D. | DESCRIPTION
1 | RESIDENTIAL LAND
2 | AUNT KATIE'S COMMUNITY GARDEN
3 | VACANT LAND
PPM CONSULTANTS, INC.
DRAWN BY: JCP
DRAWN DATE: 03/14/18
PROJECT NUMBER: 20075101
BILLING GROUP: TASK 4B
CITY OF DOTHAN
AUNT KATIE'S GARDEN
SOUTHEAST CORNER OF WHIDDON STREET
AND LINDEN STREET
DOTHAN, ALABAMA
AREA MAP
FIGURE NUMBER
3

Path Forward

- Apply for 2020 EPA Cleanup Grant this year
- Apply for ADEM's Voluntary Cleanup Program (VCP)
- Institute Engineering Controls
- Restrictive Covenant

DRAFT ABCA

ANALYSIS OF BROWNFIELDS CLEANUP ALTERNATIVES

CITY OF DOTHAN
AUNT KATIE'S GARDEN
SOUTHEAST CORNER OF
WHIDDON & LINDEN STREETS
DOTHAN, ALABAMA
ACRES NO. 236045

PPM PROJECT NO. 20075101.TASK 4C

NOVEMBER 14, 2019

ANALYSIS OF BROWNFIELDS CLEANUP ALTERNATIVES

CONDUCTED UNDER EPA BROWNFIELDS COOPERATIVE AGREEMENT BF00D58117-0

AUNT KATIE'S GARDEN
SOUTHEAST CORNER OF WHIDDON & LINDEN STREETS
DOTHAN, ALABAMA
ACRES NO. 236045

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PPM PROJECT NO. 20075101.TASK 4C

NOVEMBER 14, 2019

PREPARED BY:	REVIEWED BY:
GREGORY P. STOVER, P.G.	MICHAEL D. MCCOWN, P.G.
PROJECT MANAGER	QA MANAGER

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1.0 INTRODUCTION & BACKGROUND

PPM Consultants, Inc. (PPM) has prepared this Analysis of Brownfields Cleanup Alternatives (ABCA) to satisfy the requirements of the grant application being submitted to the United States Environmental Protection Agency (EPA) for the Aunt Katie's Garden property located on the southeast corner of Whiddon and Linden Streets in Dothan, Alabama. The purpose of this document is to identify the cleanup alternatives for the property based on the site conditions and select the best alternative. Site information used to prepare this document was taken from the Phase I Environmental Site Assessment (ESA) and Phase II ESA reports prepared by PPM.

This ABCA is written as if it addresses and advises a *bona fide prospective buyer* and future landowner of Aunt Katie's Garden property.

1.1 SITE DESCRIPTION

The subject property consists of a 0.15-acre vacant parcel of land. The eastern portion of the subject property consists of wooded land and the remainder is covered with grass. Historical aerial photographs and fire insurance maps indicate that the property was undeveloped from at least 1920 to at least 1951 and was occupied by an electrical substation from at least 1961 to at least 1997. The subject property has consisted of vacant land since at least 2003. The property is owned by the City of Dothan. The property is also known as the "former electrical substation". The property is referred to as "Aunt Katie's Garden based on its planned future use.

Properties surrounding the subject property consist of mixed commercial and residential use. The site is bordered to the north by Whiddon Street, followed by a residence; to the northeast by Whiddon Street, followed by residences; to the east by a residence; to the south by Aunt Katie's Community Garden; to the southwest by Linden Street, followed by a residence; to the west by Linden Street, followed by a residence; and to the northwest by Linden Street and Whiddon Street, followed by a residence. Historical aerial photographs, city directories, fire insurance maps, and property records indicate that the adjoining properties to the north, northeast, east, southwest, south, and northwest have been occupied by residences beginning back to at least 1920. The adjoining property to the south was occupied by a store/restaurant from at least 1948 to at least 1975 and historical city directories indicate that the store/restaurant structure was vacant in 1980, 1985, and 1989. The store/restaurant structure remained on the property until at least 2014 and the current community garden has been present since 2010.

1.2 SUMMARY OF PREVIOUS SITE INVESTIGATIONS

Phase I Environmental Site Assessment, February 2018. PPM conducted a Phase I ESA of the property in conformance with the scope of ASTM International Standard Practice E 1527-13. The Phase I ESA report reported the following recognized environmental conditions (RECs) in connection with the property:

- The subject property was occupied by an electrical substation from at least 1961 to at least 1997. It appears that the substation was operated by Alabama Power until at least 1972 and possibly until at least 1981. The 1968 Sanborn map indicates a "transformer" occupied the majority of the southern half of the property. The 1981 sketch provided by Dothan Utilities indicates a transformer pad occupied the central portion of the site. A notation labeled "APCo" is shown on the sketch, which is the abbreviation for Alabama Power. Electrical substations typically use transformers that contain high capacities of insulating, dielectric oil. Between 1930 and 1971, dielectric oils were typically composed of polychlorinated biphenyls (PCBs) based on their chemical stability, low flammability, and high dielectric constant. The characteristics that make PCBs such as good dielectric fluid also allow them to persist in the environment. PCBs are hazardous substances regulated under the Toxic Substances Control Act (TSCA). In 1971, PCBs began to be phased out in new transformer construction and were federally banned in new transformers after 1979. Even so, PCBs were allowed to remain in older, serviceable transformers after 1979 as long as they met certain conditions. Releases to soil and/or groundwater within a substation can occur due to transformer fires, service, overfills, and leaks. There was no physical evidence of the former substation during the site visit. Aerial photographs from 2003 to 2014 and current site observation reveal that the soils in the center of the property have been exposed and unable to support the growth of vegetation since a short time after the removal of the substation in around 1997. The reason for the exposed soil is unknown, but this condition may be a residual effect of the substation. It is not known whether a release has occurred to the property; however, the substation operation (1961-1997) overlapped the periods that PCB-transformers were likely in use (1930-1979±) and before any form of regulatory oversight could have existed (EPA-1970, TSCA & RCRA-1976, ADEM-1982). Because the past use of PCBs on the property is very likely and some form of release before regulation is also likely, the former electrical substation on the subject property represents a REC in connection with the property.

Phase II Environmental Site Assessment, August 2018. PPM conducted a Phase II ESA of the property in conformance with the scope outlined in Site-Specific Quality Assurance

Project Plan (QAPP) Addendum No. 1A dated May 2018. Field work for the Phase II ESA was conducted on July 26, 2018 and the PCB screening was conducted between July 27 and 29, 2018. The Phase II ESA report was issued in September 2018.

Soil borings SB-1 through SB-9 were installed on the property to assess the potential impact from the historical presence of an electrical substation on the property. Based on an estimated groundwater depth of 25 feet to 35 feet below ground surface (BGS), soil boring SB-1 was advanced to a depth of approximately 40 feet BGS. Saturated conditions were not encountered during advancement of SB-1; therefore, since the primary concern was near surface soils, a decision was made to reduce the total depth of the remaining borings to 12 feet BGS. None of the soil borings were converted into temporary wells due to groundwater not being encountered in SB-1. One grab soil sample and one composite soil sample were collected from the vadose zone of each boring for laboratory analysis; therefore, a total of 18 soil samples were collected from soil borings SB-1 through SB-9.

Soil borings SB-1, SB-2, and SB-3 were advanced in an east-west line along the northern extent of the site property. Borings SB-4, SB-5, and SB-6 were advanced in an east-west line in the central part of the property and SB-7, SB-8, and SB-9 were advanced as the other two rows of borings along the southern extent of the property.

The Phase II ESA report provided the following conclusions:

- PCB screening indicated positive PCB results in three of the 21 screened samples (14 percent); however, only 2 of the 18 samples (11 percent) analyzed for PCBs had reported detections of any PCB congeners, in this case PCB-1260. Neither sample had PCB-1260 concentrations that exceeded Regional Screening Levels (RSL). It should be noted that the soil samples with positive PCB screening results did not have detectable laboratory results and vice versa. Although there was a poor correlation between the field screening and laboratory results, the collective data does indicate there was a minor release of PCBs to soil from the past use of the property as an electrical substation. However, because all PCB analytical results were below residential RSLs, the current PCB data indicates *de minimis* conditions.
- With the exception of acetone, which is considered a laboratory cross contaminant, no volatile organic compounds (VOC) were detected in any of the soil samples.
- Semi-volatile organic compounds (SVOC) were detected in several of the soil samples, but only the sample from SB-5/1-4, located at the center of the property, had concentrations that exceeded Residential RSLs. The SVOCs exceeding Residential

RSLs were benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, and indeno(1,2,3-cd)pyrene, which are all PAHs. PPM has personal knowledge (supported by literature) that PAHs can be ubiquitous to long-settled urban properties due to the combustion of petroleum fuels and runoff from city streets; however, the location of the elevated PAHs in the center of the property indicates an onsite source. A possible source that may be associated with the property's past use as an electrical substation may be the use of heavy oils in machinery or wood materials treated with creosote. It should be noted that SB-5/1-4 is also the sample location of the highest arsenic result at the property (discussed below). The apparent anthropogenic release of PAHs to soil at concentrations above Residential RSLs is considered to represent a REC.

- Arsenic concentrations in soil ranged from <0.37 mg/kg to 1,100 mg/kg and was the only RCRA metal with concentrations exceeding Residential RSLs. Arsenic concentrations exceeded the Residential RSL of 0.68 mg/kg in at least one soil sample from each of the nine soil borings, indicating that arsenic is present above RSLs over the entire property. Arsenic is naturally-occurring in the eastern United States as reported in the *United States Geological Survey (USGS) Professional Paper (PP 1270)*, with an observed range of <0.1 to 73 mg/kg and arithmetic mean of 7.4 mg/kg. It is PPM's experience that it is common to find naturally-occurring arsenic in Gulf Coast soils up to 20 mg/kg, but typically the upper end of the range is less than 10 mg/kg. This could be used to argue the nine soil samples with concentrations between 0.87 and 13 mg/kg represent natural background; however, the four results between 56 and 97 mg/kg are outside the expected natural range and the three results between 270 and 1,100 mg/kg are highly indicative of an anthropogenic source. All three of the highest results within the center of the site and the highest arsenic result at the same location as the elevated PAHs are also considered conclusive evidence of an onsite anthropogenic source. Although there is no obvious use of arsenic at an electric substation, a possible explanation may be that arsenic was used to control rodents such as rats and squirrels, in an effort to minimize potential damage to electrical lines, or as a herbicide to control weeds. The evidence that there is very little vegetative growth on the property after more than 20 years since its last use as a substation, coincidently most prominently at the center of the property, may point to weed control. If pest or weed control was the source of the arsenic, the use of arsenic likely occurred over many years and the distribution of the arsenic to surface soils would also likely not be uniform. If the source of PAHs was creosote-treated wood products, similar wood products treated with cooper-chromium-arsenic (CCA) may be the arsenic source. The relatively low chromium concentrations do not support this hypothesis, but this possibility cannot be ruled out. Arsenic applied to loose sandy surface soils could leach into deeper subsurface soils as evidenced by generally greater concentrations in

deeper clayey soils. The apparent anthropogenic release of arsenic to soil at concentrations above Residential RSLs is considered to represent a REC.

- Groundwater was not encountered during the Phase II ESA, therefore, site specific groundwater flow direction could not be determined; however, groundwater is believed to flow southeast toward a small stream approximately 300 feet from the site.

1.3 PROPOSED SITE REDEVELOPMENT

The planned site redevelopment of the property is a community garden for vegetables. The community garden will be using techniques that do not involve planting in existing ground. Instead, the vegetables will be planted in raised beds using soil from other sources. The community garden will involve pedestrian access by the garden employees and community.

2.0 APPLICABLE REGULATIONS & CLEANUP STANDARDS

2.1 CLEANUP OVERSIGHT RESPONSIBILITY

ADEM has the responsibility for overseeing soil and groundwater cleanups that are managed under a variety of different regulatory programs. These include sites regulated under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Program, the Brownfield Redevelopment and Voluntary Clean-Up Program, the Underground Storage Tank (UST) Program, the Resource Conservation and Recovery Act (RCRA) Program, the Clean Water Act (CWA) program, the Solid Waste Program, and other sites being addressed through state statutory authority. ADEM's objective is to establish a consistent risk-based decision-making process for all sites, through which soil and groundwater corrective action decisions are made. The typical procedure in communication with ADEM from this point forward is to (1) submit notification of the discovery of a past release; (2) submit the Phase II ESA report; (3) conduct additional site investigation in accordance with the Alabama Environmental Investigation and Remediation Guidance (AEIRG) manual to identify the soil source and/or delineate impact to soil and groundwater; (4) conduct groundwater monitoring to establish trends and natural attenuation potential; (5) conduct a risk assessment in accordance with Alabama Risk-based Corrective Action (ARBCA); (6) submit a Corrective Action Plan (CAP) and/or Risk Management Plan; (7) implement corrective action or risk management; and (8) submit recommendations for No Further Action with or without restrictions. ADEM will review each deliverable and comment or approve.

Cleanup oversight should be performed by a qualified environmental contractor under the direct supervision of a Professional Geologist or Professional Engineer registered in the State of Alabama. The selected environmental contractor will oversee the work conducted by its employees and subcontractors to ensure that it is in accordance with all applicable plans, guidelines, and regulations.

2.2 CLEANUP STANDARDS

2.2.1 Soil & Groundwater

The ARBCA process uses a tiered approach with each subsequent tier being more site specific. Cleanup decisions can be made at the end of each tier. Tiers under ARBCA are the Preliminary Screening Level (PSL) evaluation, Risk Management 1 (RM-1), and RM-2. The site must be fully characterized in accordance with AEIRG before starting the risk assessment process. Full characterization generally includes horizontal and vertical delineation to RSLs and groundwater monitoring to establish trends. When chemicals of potential concern (COPC) concentrations demonstrate stable or decreasing conditions in groundwater, up to two years of groundwater monitoring data is typically required by ADEM. If COPC concentrations are fluctuating or increasing, additional years of monitoring and possibly more assessment of soil sources may be needed to establish representative concentrations.

As was done in the Phase II ESA, in the PSL evaluation COPC concentrations are compared to the most current EPA RSLs. Soil results were compared to Residential, Industrial, and GRP RSLs. RSLs are typically updated by the EPA biannually and the current RSL table is dated May 2018. A list of Chemicals of Concern (COC) is developed from those COPCs that are equal to or exceed RSLs. The COPCs that do not exceed RSLs drop out of the process and the COCs are carried forward to the cumulative risk evaluation. If the cumulative risk exceeds acceptable levels or the indoor vapor inhalation pathway is complete, the process proceeds to RM-1. The exposure pathways are established by the development of the site conceptual exposure model (SCEM). The SCEM provides the framework for the overall risk evaluation and management of the site. The SCEM identifies the land use of the surrounding area, release sources, current and future receptors, complete routes of exposure and pathways, site hydrogeology, COPCs, and COCs.

A risk-based decision making process requires the specification of a target or acceptable risk level for both carcinogenic (ca) and non-carcinogenic (nc) adverse health effects. For carcinogenic effects, risk is quantified using the Individual Excess Lifetime Cancer Risk (IELCR) that represents an increase in the probability of an individual developing cancer due to exposure to a chemical of concern through a complete Route of Exposure (ROE). Since a receptor may be exposed to multiple COCs and ROEs, the acceptable risk level accounts for the effect of simultaneous exposure to multiple COCs and ROEs. The IELCR level used for RSLs is 1E-06, while the IELCR level used in the calculation of the RM-1 and RM-2 levels is 1E-05.

For non-carcinogenic effects, risk is quantified using a Hazard Quotient (HQ) that represents the ratio of the estimated dose for a chemical and a route of exposure to the reference dose. When a receptor is exposed to multiple COCs and multiple ROEs, individual HQs are added together to estimate the Hazard Index (HI). The HI is the sum of individual HQs. An HQ of 0.1 is used for the RSLs while an HI of 1.0 is used in the RM-1 and RM-2 calculations.

The target risk levels (IELCR and HI) may be used in one of two ways. First, the representative COC concentrations are used to calculate the site-specific risk that is then compared with the target risk. If the cumulative risk (sum of risk for each COC and each complete ROE) exceeds the target risk, risk management and/or remediation may be necessary. Following a cumulative evaluation where it is determined that the acceptable risk is exceeded, target risk may be used to back calculate the Risk-based Target Levels (RBTL) for each chemical, each ROE, each medium, and each receptor. The RBTLs are then used as a guide during risk management and/or remediation activities and compared with the representative COC concentrations.

RM-1 levels are media, receptor, and pathway specific concentrations that are based on default assumptions and parameters. It is only necessary to calculate RM-1 levels after it has been determined that cumulative risk levels have been exceeded for one or more receptors. If the RM-1 evaluation determines the cumulative risk exceeds appropriate levels, the evaluation may proceed to RM-2 or the calculated RM-1 levels may be adopted as RBTLs for cleanup. RM-2 levels are site-specific levels that are based on site-specific data, such as depth to groundwater, hydraulic conductivity, soil bulk density, fractional organic carbon, porosity, etc.

In general, most ADEM programs require for GRP that COPC concentrations in groundwater must not exceed RSLs at the down-gradient property boundary, also referred

to as the point of exposure (POE). For chemicals that have an established MCL for drinking water, the MCL is the GRP standard at the POE. Additional monitoring (at a minimum) or corrective action may be required if COC concentrations exceed the groundwater ingestion values at the POE well or values protective of the POE at up-gradient sentry wells.

The outcome of the ARBCA process is to recommend no further action (NFA) status, corrective action, risk management, or some combination. Once the risk issues are established, corrective action or risk management can be focused on the parameter(s) that resulted in the risk failure. For example, if the cumulative risk failure is caused by the concentration of a specific COC at a specific location, then corrective action can strategically target the COC removal at that location. Once the cause of the risk failure has been eliminated or controlled, the recalculated cumulative risk is deemed acceptable, and other NFA criteria (see below) are met, then NFA without restrictions may be a viable recommendation. If the cumulative risk failure is caused by exposure to certain receptors (e.g. resident-child) or pathways (e.g. dermal contact and ingestion), the risk can be managed by either restricting land use to commercial or industrial or by installing engineering controls to eliminate or control the pathway. ADEM may require implementation and maintenance of land-use controls (LUC) until the requirements of unrestricted residential land use are attained or in perpetuity. Acceptable LUCs will be determined on a site-by-site basis and in accordance with the particular jurisdictional ADEM program and its guidelines.

Under the ARBCA program, ADEM may grant NFA status, with or without restrictions, when the responsible party has demonstrated the following:

- The site has been fully characterized.
- Target cumulative risk levels have been achieved.
- The groundwater plume is stable or decreasing.
- There are no groundwater resource protection-related exceedances.
- There are no surface water protection-related exceedances.
- The site concentrations have met RBTLs.

3.0 CLEANUP ALTERNATIVE EVALUATION

PPM evaluated three cleanup alternatives to address the Phase I/II ESA findings noted in previous sections of this report as follows:

- Cleanup Alternative 1 – No Action
- Cleanup Alternative 2 – Excavation with Offsite Disposal and Capping
- Cleanup Alternative 3 – Alternative 2 plus Groundwater Issues

It should be understood there are some unknowns that must be determined before cleanup alternatives can be accurately evaluated. Both Alternatives 1 and 2 assume that the findings of the Phase II ESA are representative of site conditions (i.e. further site assessment would reveal no surprises). Both Alternatives 2 and 3 assume the Phase II ESA findings were reported to ADEM and ADEM requires further assessment in accordance with AEIRG. The difference between Alternatives 2 and 3 is the outcome of the site assessment. For the purposes of this ABCA, Alternative 2 projects a best case outcome that will require site investigation, risk assessment, limited corrective action, and engineering controls. Alternative 3 represents a projected moderate-to-worst case that will require more extensive site investigation, risk assessment, a higher degree of corrective action, engineering controls, and institutional controls.

The following sections provide further analysis of these cleanup alternatives in relation to the planned site improvements and typical brownfields redevelopment considerations. Associated cost estimates are provided with each alternative.

3.1 ALTERNATIVE 1 – NO ACTION

Summary

The site property was a former electrical substation and is believed to have operated at the site from 1961 to at least 1997. Electrical substations typically use transformers that contain high capacities of insulating, dielectric oil, which for a period of time were typically composed of PCBs. PCB screening on approximately 20 of the 27 collected soil samples indicated the presence of PCBs at concentrations greater than 50 mg/kg in three of the screened samples; however, only two of the samples that were analyzed for PCBs (SB-3/0-1' and SB-6/0-1') had reported detections of PCB-1260 and neither sample had concentrations that exceeded EPA RSLs.

The only COPCs detected in soil that exceeded Residential RSLs were benzo[a]anthracene, benzo[a]pyrene, benzo[b]fluoranthene, indeno[1,2,3-cd]pyrene, and arsenic. The site data for arsenic was compared to natural background data. The arsenic concentrations in samples SB-6/0-1 and SB-9/0-1 (77 mg/kg and 97 mg/kg, respectively) fell outside the

observed range for arsenic reported in the eastern United States (<0.1 to 73 mg/kg). Also, arsenic concentrations in samples SB-5/1-4 (1,100 mg/kg), SB-6/1-4 (270 mg/kg) and SB-8/1-4 (880 mg/kg) were anomalous in comparison to the range of arsenic concentrations in the eastern United States and are indicative of a possible onsite source of arsenic. Since arsenic was not needed in the day to day operation for an electric substation, a possible scenario where arsenic may have been used at the site would be to control rodents or weeds. If rodent or weed control was the source of the arsenic, the use of arsenic likely occurred over many years and the distribution of the arsenic to surface soils would also likely be not uniform. Arsenic applied to loose sandy surface soils could leach into deeper subsurface soils as evidence by elevated concentrations in deeper soils.

Effectiveness

"No Action" may take one of several forms: (1) the *bona fide prospective purchaser* (BFPP) decides to not acquire the property, (2) the BFPP decides to acquire the property and take no subsequent action; (3) the current landowner decides to take no action; or (4) the BFPP/current landowner reports the available information to ADEM who decides to take no action.

No Action 1: If the BFPP chooses to not acquire the property, there is no further responsibility to that party.

No Action 2: If the BFPP chooses to acquire the property and take no subsequent action, that party may risk losing liability protection eligibility under CERCLA after property acquisition. Under the EPA's All Appropriate Inquiry (AAI) Rule BFPPs who buy a property must perform AAI prior to purchase and may buy knowing, or having reason to know, of contamination on the property while still enjoying the limitation on liability. The Phase I and II ESAs prepared under the City of Dothan EPA Brownfields Assessment Grant have the purpose of satisfying AAI. After acquiring the property, to maintain the liability protections, the new landowner must comply with "continuing obligations" during their property ownership. The continuing obligations include:

1. Provide all legally required notices with respect to the discovery or release of a hazardous substance;
2. Exercise appropriate care with respect to the hazardous substances by taking reasonable steps to stop or prevent continuing or threatened future releases and exposures, and prevent or limit human and environmental exposure to previous releases;

3. Provide full cooperation, assistance, and access to persons authorized to conduct response actions or natural resource restoration;
4. Comply with land use restrictions and not impede the effectiveness of institutional controls; and
5. Comply with information requests and subpoenas.

In the event the new landowner uses the property as a community garden, "no action" whatsoever will not be compatible with the continuing obligations. In the presence of near surface arsenic and PAHs in soil, items 2 and 4 will require an action similar to Alternatives 2 and 3.

No Action 3: If the current owner chooses to take no action, the shallow soils will pose a health risk to trespassers into the future.

No Action 4: If ADEM chooses to take no action, then the BFPP/landowner will have a higher level of comfort.

Implementability

No Action 1: This choice is implementable and has no liability risk to the BFPP. This choice is available to Aunt Katie's Garden, but is not available to the City of Dothan.

No Action 2: This choice is implementable, but under certain conditions. Although Aunt Katie's Garden may construct gardens that pose no risk to vegetable produce, exposed shallow soils may still pose a health risk to pedestrians working and visiting the garden; therefore, purchase without any mitigation by another party is not recommended. Conversely, if Alternative 2 or Alternative 3 is taken by the City of Dothan, the continuing obligations to the new landowner will be both implementable and limit liability risk.

No Action 3: This choice is not considered implementable because it has a very high liability risk to the current landowner. At a minimum, property access by trespassers should be prevented by a high fence.

No Action 4: Based on the elevated arsenic concentrations in shallow soils at the site located within a residential neighborhood, it is unlikely ADEM will choose to take no action. Another type of "no action" by ADEM is taking no action against the BFPP/current landowner, but actionable pursuit of the true responsible party (RP). In this

case, the potentially responsible parties (PRP) are Alabama Power and the City of Dothan, the current landowner. It is possible that the City of Dothan may be able to successfully argue that Alabama Power is the RP, but this may need to be done in court.

Cost

No Action 1: $0 to BFPP
No Action 2: Minimal to BFPP
No Action 3: $5-10,000 for a fence
No Action 4: $30-$50,000 for additional site investigation, which may be performed under the existing EPA Assessment Grant.

3.2 ALTERNATIVE 2 – EXCAVATION & CAPPING: NON-HAZARDOUS WASTE

Summary

The primary COC at the site is arsenic which was present above the Residential RSL of 0.68 mg/kg in at least one soil sample from each of the nine soil borings, indicating that arsenic is present above RSLs over the entire property. The maximum arsenic in surficial soils (0-1 feet BGS) was 97 mg/kg. The highest arsenic concentrations were found in soils ranging from 1-4 feet BGS. These included three samples located on the center, south-center, and east-center portions of the property with concentrations of 1,100 mg/kg, 880 mg/kg, and 270 mg/kg, respectively. The data indicates the arsenic that may have been applied in the past to the loose, sandy surface soils have over time leached to subsurface clayey soils where it was able to accumulate. The only PAHs above Residential RSLs are also found in the 1-4 feet BGS sample from the center site sample.

Alternative 2 includes a entering the Voluntary Cleanup Program (VCP), limited additional soil testing, preparation of a corrective action/risk management plan (CAP/RMP), soil excavation to a maximum depth of 2 feet BGS, and installation of engineering controls.

The Alabama Land Recycling and Economic Redevelopment Act created a state voluntary cleanup program that is administered by the ADEM Land Division. The Act allows for the assessment and remediation of contaminated sites and grants certain liability protections, including protection from third party lawsuits, to those non-responsible entities wishing to redevelop brownfields sites. The liability protections are fully transferable to any non-responsible party who may purchase the site provided all land use controls are adequately

maintained. If deemed eligible, the applicant submits a review fee and will be responsible for site assessment and cleanup. Upon successful completion of cleanup activities ADEM will issue a Letter of Concurrence which grants the applicant the full liability protections cited in the Act. If the site is not remediated to unrestricted use, the applicant must enter into an Environmental Covenant with ADEM that identifies institutional and/or engineering controls use to protect human health and the environment. As long as these use controls are maintained, the site retains its liability protections provided by the program.

Based on preliminary discussions with ADEM, there are three options that will likely satisfy VCP requirements.

Option 1: The first option is to excavate all of the soil to a depth of 1 feet BGS, replace the soil to the original grade with pre-screened clean fill, then pave the area with an impermeable barrier such as asphalt that will serve as a cap so that deeper soil no longer poses a risk to human health and the environment.

Any pavement material used to cap the site will periodically require repairs to maintain the engineering controls under the restrictive covenant. The impermeable cap will need to be maintained as long as the high levels of arsenic exist in the deeper soil.

Arsenic is an elemental metal, so it will not biodegrade into more benign substances over time. Arsenic may leach from shallow to deeper soil over time thereby gradually reducing concentrations in shallower soils, but with an impermeable cap in place the leachability will be curtailed and concentrations will essentially remain unchanged forever.

Because the capped arsenic levels will never change, the impermeable cap will require maintenance into the indefinite future, and the level of care exemplified by future owners will be difficult to control, Option 1 is not considered viable compared to the other options.

Option 2: The second option is to excavate all of the soil to a depth of 2 feet BGS, then replace the soil to the original grade with pre-screened clean fill that will itself serve as a cap so that deeper soil no longer poses a risk to human health and the environment. The primary advantage of Option 2 over Option 1 is that a cap made exclusively of soil will require minimal if any maintenance over time.

The entire site encompasses approximately 6,795 square feet (0.156 acres) in area. The estimated maximum volume that may require excavation is estimated as follows:

- 0.156 acre = 6,795 square feet (SF) x 2 feet (maximum depth) = 13,590 cubic feet (CF) ¸ 27 sf/cubic yard (CY) = 504 CY x 1.4 tons/CY = 706 tons (rounded).

Based on this calculation, approximately 706 tons of impacted soil will be removed from the site and disposed of offsite at a permitted landfill. Since the sole objective of Option 2 is to remove soil to a specified depth to each property boundary, there should be no need for confirmation soil sampling from the base and sidewalls of the excavation. In addition, the soil excavation can proceed at a constant, efficient pace without any need to wait for confirmation sample results.

Under Option 2, the estimated time needed to excavate the site is 4 to 8 days. The primary impediment to speed will be maneuverability of the excavation equipment and dump trucks within this small site.

Option 3: The third option will require additional soil testing at nearby locations that should not be influenced by the onsite activities in order to establish the natural background for arsenic in native soil. This local background information may eliminate the need to excavate to 2 feet BGS at all locations. At this time the local background concentrations are unknown, but for planning purposes background concentrations of 20, 15, 10, and 5 mg/kg will be used as target cleanup levels.

Assuming each of the 9 soil borings represents an equal area or unit, each boring area is approximately 755 square feet. Each unit consists of two 1-foot thick subunits from 0-1 feet BGS and 1-2 feet BGS. Each 1-foot thick subunit represents approximately 39 tons. Excavating to only 1 feet BGS in a unit eliminates 39 tons and not excavating a unit eliminates 78 tons. If the 0-1 feet BGS sample in a unit exceeds the background concentration, and the 1-4 feet BGS sample does not, the unit will only be excavated to 1 feet BGS. If the 1-4 feet BGS sample in a unit exceeds the background concentration, then the entire unit will be excavated to a depth of 2 feet BGS.

A comparison of each unit to the possible target cleanup levels is presented below in **Table 3.2-1**.

Table 3.2-1
Comparison of Site Data to Conceptual Target Cleanup Levels

Boring ID	Unit	Interval (ft. BGS)	Arsenic (mg/kg)	Target Cleanup Level (mg/kg)				
				0.68	5	10	15	20
SB-1	1A	0-1	<0.37	<	<	<	<	<
	1B	1-4	7.0	>	>	<	<	<
SB-2	2A	0-1	11	>	>	>	<	<
	2B	1-4	6.9	>	>	<	<	<
SB-3	3A	0-1	56	>	>	>	>	>
	3B	1-4	4.5	>	<	<	<	<
SB-4	4A	0-1	0.87	>	<	<	<	<
	4B	1-4	13	>	>	>	<	<
SB-5	5A	0-1	<0.39	<	<	<	<	<
	5B	1-4	1100	>	>	>	>	>
SB-6	6A	0-1	97	>	>	>	>	>
	6B	1-4	270	>	>	>	>	>
SB-7	7A	0-1	9.3	>	>	<	<	<
	7B	1-4	7.0	>	>	<	<	<
SB-8	8A	0-1	2.1	>	<	<	<	<
	8B	1-4	880	>	>	>	>	>
SB-9	9A	0-1	77	>	>	>	>	>
	9B	1-4	58	>	>	>	>	>
Eliminated Units				0	1	6	9	9
Eliminated Tons				0	39	234	351	351
Excavation Tons				706	667	472	355	355

Yellow indicates upper sample is below target level, but must still be excavated
Orange indicates sample exceeds target level and requires excavation
Green indicates both samples in unit are below target level and do not need excavation

Note that there is no difference in eliminated subunits at target cleanup level of 15 and 20 mg/kg. This would remain true up to nearly 60 mg/kg, which is a very unlikely natural background level.

Based on this comparison, it is possible that a significant volume of soil may be eliminated from excavation if the target cleanup level is greater than 10 mg/kg; however, the most likely background concentration is expected to be between 5 and 10 mg/kg. This judgement is somewhat based on past experience with Gulf Coast soils, but the site data also suggests the natural background is within this range. The 0-1 feet BGS samples appear to represent a sandy fill material, so therefore do not represent natural background. The 1-4 feet BGS samples do appear to represent native soil. There are three apparent tiers of arsenic concentrations in the apparent native soil: (1) five samples ranging from 2.1 to

13 mg/kg and averaging 7.68 mg/kg; (2) one sample with a concentration of 58 mg/kg; and three samples ranging from 270 to 1,100 mg/kg averaging 750 mg/kg. All of the tier 1 samples are from the five units on the edges of the property bordering the streets to the west and north. All of the tier 2 and tier 3 samples are located within the interior of the property in the center and to the east, southeast, and south of the center. The correlation of data to their locations indicates it is possible tier 1 reflects the natural background concentration of arsenic in this setting.

Other cost considerations include additional sampling and time costs. First, there will need to be an additional mobilization to the site in order to collect a representative number of background soil samples in the vicinity. In accordance with AEIRG, to establish background surface and subsurface soil conditions, a minimum of 4 soil borings should be collected in an area up gradient from and unaffected by facility operations. The arithmetic mean of the results of the soil samples should be used as the background soil concentration for the respective sampling interval.

During excavation there will also be a need to collect confirmation sidewall samples at boundaries that are in common with units that are not slated for excavation. In this estimate it is assumed that the boundaries are at the half-way point between each soil boring. In reality, arsenic concentrations may vary greatly over short distances. If the sidewall arsenic results at a unit boundary are below target cleanup levels, the excavation will stop; however, if the sidewall arsenic results exceed target cleanup levels, the excavation will continue until sidewall arsenic results are below target cleanup levels or they reach another excavation. In summary, it is possible large segments of assumed "clean" units may still require excavation.

In addition, excavation activities cannot be completed until after all confirmation results are received and are below target cleanup levels. The standard laboratory turnaround time for arsenic is 5 days. Expedited turnaround at an additional premium is available with 1 to 2 days plus 1 day for shipping. Under Option 3, the estimated time needed to excavate the site, depending on confirmation results, is 10 to 15 days.

Prior to disposal (applicable to all options), the soil will need to be characterized to determine if it is hazardous waste by testing for relevant COCs by the Toxicity Characteristic Leaching Procedure (TCLP). It may have value in the decision making process, to resample and analyze the locations with tier 3 concentrations for TCLP arsenic. If the highest total arsenic results for grab samples do not fail TCLP, this will be a good indication that the composite results for the excavated material as a whole will also not fail

TCLP. Alternative 2 assumes the excavated material will be characterized as non-hazardous waste. This will mainly be an issue with the arsenic. If the excavated material is characterized as hazardous waste, the cost of disposal will increase significantly and will be addressed under Alternative 3. Alternatives to landfill disposal may include recycling for beneficial reuse at a cement plant.

Following the removal of the impacted soil, pre-screened clean fill will be brought to the site and placed on the property until it is restored to its original grade. The fill will be analyzed by a laboratory prior to being placed on the site to ensure it is free of contaminants. If required, a witness barrier may be installed at the contact between the native soil and the fill material. This clean fill material will serve as an engineered cap that eliminates contact by humans at the surface and will be easy to maintain into the future.

After the prescribed soils have been excavated and the engineering controls have been installed, the applicant must enter into an Environmental Covenant with ADEM that identifies the institutional and engineering controls use to protect human health and the environment. The institutional control that will apply to this site is the restriction of groundwater use. As long as these use controls are maintained, the site retains its liability protections provided by the program.

Effectiveness

The removal of the upper 1 to 2 feet of soil and its replacement with clean, pre-screened soil as a capping material will effectively eliminate the human health exposure pathways available to arsenic and PAHs, which are ingestion, dust inhalation, and dermal contact. The installation of a witness barrier at the bottom of the excavation will serve as a warning to future construction workers that may have reason to dig or trench through the cap in the future. The planned use of the property as a community garden with aboveground beds will not involve the planting of any crops in the cap material. This will eliminate the potential that arsenic in deeper soils could be drawn into the plants by their root systems.

Implementability

This alternative should be fully implementable.

Cost

The projected range of costs for Alternative 2 is provided below in **Table 3.2-2**:

Table 3.2-2
ALTERNATVE 2: Projected Range of Costs

Activity	Target Cleanup Level (mg/kg) Scenario			
	0.68	5	10	15/20
Background Arsenic Testing	$0	$10,000	$10,000	$10,000
TCLP Testing	$10,000	$10,000	$10,000	$10,000
CAP/RMP Preparation	$12,000	$12,000	$12,000	$12,000
Non-HAZ Soil Excavation/Disposal	$120,000	$114,000	$80,000	$60,000
Professional Oversight	$30,000	$30,000	$28,000	$22,000
Post-excavation Sampling	$0	$5,000	$5,000	$5,000
Fill Replacement Screening	$5,000	$5,000	$5,000	$5,000
Clean Fill Dirt	$11,000	$10,000	$7,000	$5,000
Witness Barrier Installation	$30,000	$30,000	$28,000	$25,000
Restrictive Covenant	$10,000	$10,000	$10,000	$10,000
VCP Enrollment Fee	$32,000	$32,000	$32,000	$32,000
TOTAL	**$260,000**	**$268,000**	**$227,000**	**$196,000**
AVERAGE	**$237,750**			

Note that the cost of full excavation to remove all soil greater than 0.68 mg/kg to a depth of 2 feet BGS is less than the cost of excavating to a target level of 5 mg/kg. This is due to the minimal reduction in eliminated subunits and the added cost of background and post-excavation arsenic testing. The most significant cost reduction is using target levels of 15-20 mg/kg; however, the likelihood that the background concentrations will be in this range is low. As presented previously, the most likely background concentration is between 5 and 10 mg/kg. If the projected subunit dimensions prove to be accurate, a cost savings of $10,000 to $32,000 may be realized; however, if the excavations expand beyond the projected boundaries to pursue elevated sidewall sample results, these savings may be reduced. It is also possible with additional testing and reduced time efficiency, that the final cost of excavating to target levels may be higher than simply excavating all materials to 2 feet BGS. The added benefit of excavating to 2 feet BGS across the entire site is to preempt perceived concerns about what remains within 2 feet of the surface. The most likely cost under Alternative 2 is projected to be $268,000.

3.3 ALTERNATIVE 3 – EXCAVATION & CAPPING: HAZARDOUS WASTE

Summary

Alternative 3 assumes that all soil samples (grab or composite, individual or average, in situ or waste, existing or future) with arsenic concentrations greater than 100 mg/kg will fail TCLP analysis.

The TCLP process involves a 20-times dilution of the sample to determine whether the material exhibits characteristics of a hazardous waste. As a general rule of thumb, the total concentration of the relevant contaminant (e.g. arsenic) must be at least 20 times the toxicity characteristic maximum level (ML) to be able to exceed the ML. In that the ML for arsenic is 5 milligrams per liter (mg/L), the total concentration must therefore be at least 100 mg/kg to fail TCLP.

If the entire site is excavated and treated as a single unit, the TCLP samples will be composites of the bulk material. The arithmetic average of all arsenic results is 144.5 mg/kg; therefore, it is probable that the entire unit of excavated soil tested as a whole may fail TCLP. As previously demonstrated on **Table 3.2-1**, this represents between 355 and 706 tons of hazardous waste.

If the excavated soil is segregated based on the existing grab sample results, then only the three subunits exceeding 100 mg/kg (5B, 6B, and 8B) will be hazardous waste under this scenario. These three subunits would therefore represent approximately 117 tons of hazardous waste.

The primary benefit of segregation is reducing the cost of hazardous waste disposal, which may be nearly double the cost of non- hazardous waste disposal due to higher fees at the landfill and greater transportation distances. For example, non-hazardous waste can most likely go to any Subtitle D landfill under ADEM permit of which there are several in south Alabama. The only Subtitle C hazardous waste landfill in Alabama is the Chemical Waste Management facility in Emelle located approximately 240 mile from Dothan.

Effectiveness

The end result of Alternatives 2 and 3 will be the same, so they will both be equally effective. The primary difference will be the cost of hazardous waste disposal and the fact that the City of Dothan will be designated as a generator of hazardous waste.

Implementability

This alternative should be fully implementable.

Cost

The projected range of costs for Alternative 3 is provided below in **Table 3.3-1**:

Table 3.3-1
ALTERNATVE 3: Projected Range of Costs

Activity	Target Cleanup Level (mg/kg) Scenario							
	WASTE TREATED AS A WHOLE UNIT				NON-HAZ SEGREGATED FROM HAZ UNITS			
	0.68	5	10	15/20	0.68	5	10	15/20
Background Arsenic Testing	$0	$10,000	$10,000	$10,000	$0	$10,000	$10,000	$10,000
Preliminary TCLP Testing	$10,000	$10,000	$10,000	$10,000	$10,000	$10,000	$10,000	$10,000
Final TCLP Testing	$5,000	$5,000	$5,000	$5,000	$5,000	$5,000	$5,000	$5,000
CAP/RMP Preparation	$12,000	$12,000	$12,000	$12,000	$12,000	$12,000	$12,000	$12,000
Soil Excavation/Disposal Non-HAZ	$0	$0	$0	$0	$105,000	$96,000	$61,000	$41,000
Soil Excavation/Disposal HAZ	$240,000	$226,742	$160,453	$120,680	$40,000	$40,000	$40,000	$40,000
Professional Oversight	$32,000	$32,000	$30,000	$25,000	$32,000	$32,000	$30,000	$25,000
Post-excavation Sampling	$0	$5,000	$5,000	$5,000	$0	$5,000	$5,000	$5,000
Fill Replacement Screening	$5,000	$5,000	$5,000	$5,000	$5,000	$5,000	$5,000	$5,000
Clean Fill Dirt	$11,000	$10,005	$7,080	$5,325	$11,000	$10,000	$7,000	$5,400
Witness Barrier Installation	$30,000	$30,000	$28,000	$25,000	$30,000	$30,000	$28,000	$25,000
Restrictive Covenant	$10,000	$10,000	$10,000	$10,000	$10,000	$10,000	$10,000	$10,000
VCP Enrollment Fee	$32,000	$32,000	$32,000	$32,000	$32,000	$32,000	$32,000	$32,000
TOTAL	**$387,000**	**$387,747**	**$314,533**	**$265,005**	**$292,000**	**$297,000**	**$255,000**	**$225,400**
AVERAGE	**$338,571**				**$267,350**			
MEDIAN	**$326,376**				**$261,200**			
OVERALL AVERAGE	**$302,961**							

If the whole unit of material is characterized as hazardous waste, the costs will be range from $40,000 to $100,000 greater than the same target level scenario where the hazardous subunits are segregated. This means there is an obvious incentive to segregating the material into units that are likely to be non-hazardous or hazardous before sampling for TCLP analysis. The most likely cost under Alternative 3 is projected to be the upper end of the non-hazardous range, which is $297,000.

4.0 SELECTED CLEANUP ALTERNATIVE

Based on the current data, the alternative most likely to match reality is Alternative 3. The basic plan to conduct limited excavation and implement engineering and institutional controls is the same under both alternatives. The functional difference in the two

alternatives is the ultimate cost resulting from the outcome of (1) background arsenic testing to establish target cleanup levels; (2) post-excavation sidewall testing that will dictate the actual boundaries of the excavation; and (3) TCLP testing of the waste material. Until these parameters are known, the final cost is projected to be most likely cost projected under Alternative 3, which is **$297,000**.

It is understood that the City of Dothan plans to apply for an EPA Brownfields Cleanup Grant that, if awarded, will become effective for the expenditure of cleanup funds in October 2020.

Cost Share Resolution

RESOLUTION NO. 2019-284

Whereas, the Environmental Protection Agency is making funds available to determine if property is contaminated or may be contaminated by hazardous substances or other pollutants, and

Whereas, the City of Dothan has successfully completed 82% of the existing Assessment Grant project, with all remaining project funds allocated to final work program tasks, and

Whereas, the City's EPA project manager and the Brownfield Section Chief at ADEM have declared Dothan to be a model Brownfield Program, and

Whereas, the City of Dothan Planning Department staff has identified over twenty-five highly suspected Brownfield sites along Columbia Road and U. S. Highway 231 (inside Ross Clark Circle), and

Whereas, the City of Dothan Planning Staff desires to apply for grant funding to assess if environmental contamination exists along those two roadway corridors, and

Whereas, the proposed Assessment Grant theme will be defined as "Brownfield Corridors Impacting the Revitalization of Dothan's Downtown Districts, and

Whereas, Planning Department staff will collaborate with the firm of PPM Consultants to prepare a Brownfields Assessment Grant application.

NOW, THEREFORE, BE IT RESOLVED by the Board of Commissioners of the City of Dothan, Alabama, as follows:

Section 1. That Planning Department staff is authorized to collaborate with the firm of PPM Consultants to submit an application for a Brownfield's Assessment Grant.

Section 2. The City of Dothan accept the grant if awarded and authorize release of a Request for Qualifications.

Section 3. That Mark Saliba, Mayor of the City of Dothan and in such capacity is hereby authorized and directed to sign said application for and in the name of the City of Dothan, which shall be attested to by the City Clerk.

PASSED, ADOPTED AND APPROVED on November 5, 2019.

ATTEST:

City Clerk

Mayor

Associate Commissioner District 1

Associate Commissioner District 2

Associate Commissioner District 3

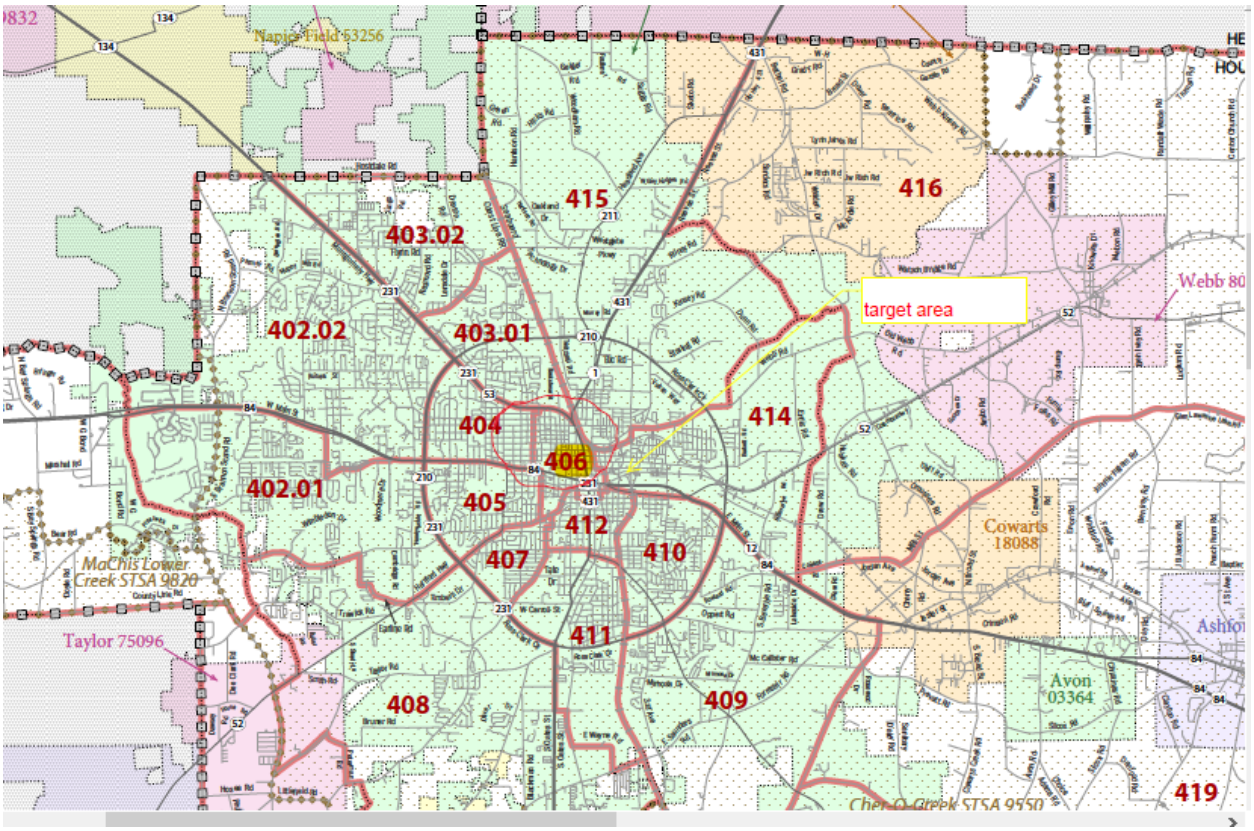
Associate Commissioner District 4

Associate Commissioner District 5

Associate Commissioner District 6

BOARD OF CITY COMMISSIONERS

Target Area of Brownfields Cleanup Grant (Baptist Bottom, Census Tract 406, Dothan, AL)



OMB Number: 4040-0004
Expiration Date: 12/31/2019

Application for Federal Assistance SF-424

* 1. Type of Submission:
- [ ] Preapplication
- [x] Application
- [ ] Changed/Corrected Application

* 2. Type of Application:
- [x] New
- [ ] Continuation
- [ ] Revision

* If Revision, select appropriate letter(s):

* Other (Specify):

* 3. Date Received: 12/02/2019

4. Applicant Identifier: City of Dothan

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name: City of Dothan, Alabama

* b. Employer/Taxpayer Identification Number (EIN/TIN):

* c. Organizational DUNS: 0720968290000

d. Address:

* Street1: 126 North Andrews Street
Street2:
* City: Dothan
County/Parish: Houston
* State: AL: Alabama
Province:
* Country: USA: UNITED STATES
* Zip / Postal Code: 36303-4837

e. Organizational Unit:

Department Name: Planning and Development

Division Name:

f. Name and contact information of person to be contacted on matters involving this application:

Prefix: Mr.
* First Name: Robert
Middle Name:
* Last Name: Wilkerson
Suffix:

Title: Planner II

Organizational Affiliation: City of Dothan Employee

* Telephone Number: 334-615-3415
Fax Number:

* Email: bwilkerson@dothan.org

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

Environmental Protection Agency

11. Catalog of Federal Domestic Assistance Number:

66.818

CFDA Title:

Brownfields Assessment and Cleanup Cooperative Agreements

*** 12. Funding Opportunity Number:**

EPA-OLEM-OBLR-19-07

* Title:

FY20 GUIDELINES FOR BROWNFIELD CLEANUP GRANTS

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

1234-Target Area of Brownfields Cleanup Gra | Add Attachment | Delete Attachment | View Attachment

*** 15. Descriptive Title of Applicant's Project:**

Brownfields Cleanup Grant, Hazardous Substances Former Electrical Substation, Corner of Linden and Whiddon Streets, Dothan, AL 36303

Attach supporting documents as specified in agency instructions.

Add Attachments | Delete Attachments | View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant: AL-002 * b. Program/Project: AL-002

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment | Delete Attachment | View Attachment

17. Proposed Project:

* a. Start Date: 10/01/2020 * b. End Date: 09/30/2023

18. Estimated Funding ($):

* a. Federal	500,000.00
* b. Applicant	100,000.00
* c. State	0.00
* d. Local	0.00
* e. Other	0.00
* f. Program Income	0.00
* g. TOTAL	600,000.00

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

☐ a. This application was made available to the State under the Executive Order 12372 Process for review on .

☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.

☒ c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment | Delete Attachment | View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: Mr. * First Name: Robert

Middle Name:

* Last Name: Wilkerson

Suffix:

* Title: Planner II

* Telephone Number: 334-615-3415 Fax Number:

* Email: bwilkerson@dothan.org

* Signature of Authorized Representative: Robert W Wilkerson * Date Signed: 12/02/2019