



R03-24-M-004

TOWN OF DUBLIN
P.O. BOX 1066 DUBLIN, VA 24084
Office: (540)674-4731; Fax: (540)674-4804

1. Applicant Identification: Town of Dublin, 101 Dublin Park Rd, Dublin, Virginia, 24084
2. Funding Requested:
 - a. Grant Type: Multipurpose
 - b. Federal Funds Requested: \$1,000,000
3. Location:
 - a. Town of Dublin
 - b. Pulaski County
 - c. Virginia
4. Target Area and Priority Site/Property Information:
 - Target Area(s) discussed: Priority sites in the Dublin Town Limits Target Area US Census Tract (CT) 51155210600.
 - Address of the priority sites in Target Area: Town of Dublin Industrial Park, 600 Newbern Road, Dublin, Virginia, 24084. Below priority sites all have the same address but are on different parcels:
 - Site/Area #1 Former Wastewater Treatment Plant/Future Use Area C (Portion of Parcel #056-1-067) (79 acres)
 - Site/Area #2 Mixed-Used District (Parcels 056-1-T-110A, 056-1-115, 056-32-1,056-32-2, 056-1-T-110) (16.5 acres)
 - Site/Area #3 Warehouse District (Portion of Parcel #056-1-067) (41 acres)
 - Site/Area #4 Future Use Area A (Portion of Parcel #056-1-067, 065-1-170) (27.4 acres)
 - Site/Area #5 Future Use Area B (Portion of Parcel #056-1-067, 056-1-67C, 056-1-111, 056-1-114) (38 acres)
5. Contacts:
 - a. Project Director:

Ty Kirkner, City Manager
Address: 101 Dublin Park Road, Dublin, VA 24084
Phone: (540) 674-4798
Email: tkirkner@dublintown.org
 - b. Chief Executive/Highest Ranking Elected Official:

Benny P. Skeens, Dublin Town Mayor
Address: 101 Dublin Park Road, Dublin, VA 24084
Phone number: (540) 674-4798
Email address: bskeens@radford.edu



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- 6. Population: 2,680
- 7. Other Factors:

Sample Format for Providing Information on the Other Factors	Page #
Community population is 10,000 or less	1
The applicant is, or will assist, a federally recognized Indian tribe of United States territory.	
The priority site(s) is impacted by mine-scarred land.	
The priority site(s) is adjacent to a body of water (ie., the border of the priority site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water for a street, road, or other public thoroughfare separating them).	
The priority site(s) is in a federally designated flood plain.	
The reuse of priority site(s) will facilitate renewable energy from wind, solar or geothermal energy	3,4
The reuse of the priority site(s) will incorporate energy efficiency measures.	4,5,6,7, 9,10,11
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	4,5,6,7,9,10,11
At least 20% or more of the overall project budget will be spent on eligible reuse/area-wide planning activities, as described in Section I.B, for priority sites within the target area(s).	10
The target area(s) is located within a community in which a coal-fired power plant has recently closed (2013 or later) or is closing.	

- 8. Letter from the State or Tribal Environmental Authority: See Attached
- 9. Releasing Copies of Applications:

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



Commonwealth of Virginia

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

1111 E. Main Street, Suite 1400, Richmond, Virginia 23219

P.O. Box 1105, Richmond, Virginia 23218

(800) 592-5482 FAX (804) 698-4178

www.deq.virginia.gov

Travis A. Voyles
Secretary of Natural and Historic Resources

Michael S. Rolband, PE, PWD, PWS Emeritus
Director
(804) 698-4000

November 10, 2023

Tyler Kirkner, Town Manager
Town of Dublin
101 Dublin Park Road
Dublin, VA 24084

VIA ELECTRONIC MAIL

Subject: Acknowledgement and Support – Town of Dublin
FY 2024 USEPA Multipurpose Grant Program
EPA-OLEM-OBLR-23-11

Dear Mr. Kirkner:

The Virginia Department of Environmental Quality (DEQ) is in receipt of your request for support to the above referenced Brownfields Grant application. The request will be for an EPA Multipurpose Grant for the Town of Dublin.

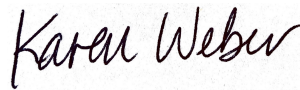
It is our understanding that the Town of Dublin intends to use these funds for assessment, cleanup, and planning activities for five target sites within the Town of Dublin Industrial Park. VDEQ recognizes the Town's efforts to assess the Industrial Park and promote commercial and industrial expansion in that area from other ongoing efforts that we are aware of. The DEQ Brownfields Program is pleased to provide our support for this grant proposal and feels that if successful the grant funds will play a vital role in continuing revitalization and redevelopment efforts as well as supporting jobs creation to boost the local economy.

It is our sincere hope that this EPA proposal will be successful, and that the Town will be able to continue leveraging funds to stimulate economic development and revitalization within the target area.

Acknowledgement and Support – Town of Dublin
USEPA’s Multipurpose Grant
EPA-OLEM-OBLR-23-11
Page 2 of 2

If we can be of further assistance, please don’t hesitate to contact us.

Sincerely,

A handwritten signature in black ink that reads "Karen Weber". The signature is written in a cursive style and is positioned above the typed name.

Karen Weber, CPG
Brownfields Coordinator

cc: Meade Anderson, CPG, DEQ-CO
Lucas Hamelman, CPG, DEQ-CO
Nichole Herschler – DEQ-BRRO

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

1.a. Target Area and Brownfields

1.a.i. Overview of Brownfields Challenges and Description of Target Area:

The Town of Dublin, Virginia proposes to conduct eligible brownfields assessment, cleanup and planning activities within the Target Area, in the Town of Dublin (2,680 pop) within Pulaski County (33,800 pop) utilizing funding from a FY2024 Multipurpose grant. The Target Area is The Dublin Industrial Park, a 271-acre site in the Dublin town limits and US census tract (CT) 51155210600, a large Census Tract covering areas within the Town of Dublin town limits and Pulaski County. Given that the town of Dublin covers only 832 acres, the subject site represents over 30% of the town's land mass. Dublin is located in southern Virginia, just north of I-81, and south of Jefferson National Forest. Roanoke is the closest city, 53.7 miles to the east.

The Dublin Industrial Park was originally part of the Radford Armory Ammunition New River Ordinance Unit during the pre-war efforts beginning in the late 1930s, and as a bag manufacturing and loading plant until 1945. The site operated as a self-sufficient facility, with its boiler house, water filtration, and sewage treatment facility. Much of the infrastructure remains from the manufacturing area of the New River Ordinance Unit. After WWII, the site was considered to be surplus property and federal ownership was relinquished. Burlington Industries purchased the property in 1947 and utilized it as a fabric processing plant where textiles were cured, dyed, and treated to produce multiple types of fabrics and materials. The town acquired the Dublin Industrial Park in 1993 through purchase of 101 acres and 1994 through donation of an addition 170 acres from Burlington Industries.

These former uses left multiple contaminants at the site, including identified asbestos-containing materials (ACMs), lead paint, lead piping, lead, copper, PCBs, and other potential contaminants including PFAS from historic fabric processing operations. In 1989, there was a release of petroleum products from underground storage tanks on the Burlington Industries property, which the Virginia DEQ oversaw the completion of the closure report in 2014 and abandonment of wells associated with monitoring the release. In addition, Burlington Industries completed ACM sampling, completed limited abatement including securing and marking the remaining asbestos insulation so that structures could be utilized for warehouse storage and logistics for area manufacturing facilities. Other permits associated with the property (wastewater permit, hazardous waste permit, air permit) have been terminated or closed.

The Dublin Industrial Park contains multiple buildings or features including: the main processing plant, the boiler house building, an abandoned kerosene oil tank, several warehouses, and an old water and sewage treatment facility with sludge requiring cleanup. A Phase I Environmental Site Assessment, conducted in July 2023 on the main processing plant and boiler house building, confirmed the presence of ACMs throughout the building. Further, the report identified the potential for PCB transformers in areas that were inaccessible during the inspection.

The Brownfield challenges presented by the Target Area's history include the multiple sites needing environmental assessment, asbestos abatement, remediation, and reuse plans due to the past industrial uses of the site. Dublin has moved away from industries like fabric processing which have been largely moved overseas, and many buildings have been left vacant with multiple issues and blight. According to the Climate and Environmental Justice Screening Tool (CEJST), the amount of low-income households is in the 61st percentile and unemployment is in the 81st percentile, which limits the tax base in Dublin. **The lack of town funds and tax revenue is an impediment to performing the assessments and abatement/remediation needed to develop an accurate cleanup and revitalization plan.** The town code limits revenue generation to specific taxes and user fees. Currently the Dublin Industrial Park generates rental income to support the Town's Enterprise Fund

to reduce water, sewer and garbage fees for their residential population.

The Dublin Industrial Park Target Area provides 30% of the town's revenue from rental income and tool taxes, yet only 30% of the entire Target Area is developed. The remaining 70% of the Target Area has the potential for development, which would increase both rental income and the town's tax revenue. When the Dublin Industrial Park area was first acquired, buildings without perceived legacy contamination (like those in the Warehouse District) have been largely developed for commercial or retail uses. The remaining areas of the Dublin Industrial Park are underutilized because of known asbestos contamination or the perceived contamination from legacy land use. Industries like Camrett Logistics, a current tenant in the Main Plant, have expressed interest in further developing within the park, which would attract other income-generating businesses like warehousing, logistics and light manufacturing to provide higher-paying jobs for residents. Most importantly, the revitalization project aims to convert this large tract of environmentally contaminated land into a community asset through assessment, remediation, and community-based reuse planning. The Dublin Industrial Park has evolved for decades to support the surrounding community; however, in its current state, it is a source of blight and potential contaminant exposure to residents. An overarching goal of the Dublin Industrial Park revitalization is to plan and implement its next iteration by transitioning from reliance on fossil fuels to green energy, maximizing climate adaptations and mitigations on each priority site and additional sites.

1.a.ii. Description of the Priority Brownfield Site(s): The Dublin Industrial Park Target Area is made up of five sites or areas. All of these priority sites are owned by the Town of Dublin. The town affirms that it is not responsible for the contamination, as noted previously. One priority site (Site #5) is partially owned privately. Site access will be granted for necessary assessment and cleanup, should this grant be awarded.

Site/Area #1 Former Wastewater Treatment Plant/Future Use Area C (79 acres) (Portion of Parcel #056-1-067)

South of Future Use Area B, is a parcel owned by the Town of Dublin, a former Wastewater Treatment Plant and Future Use Area C. The parcel contains eight former wastewater treatment structures that need assessment, including underground wells used to characterize subsurface petroleum contamination, an former water treatment plant, and old pump stations. **An unnamed tributary of the New River runs through Site/Area #1.** New uses will be determined based on assessment results including potential plans to build structures to support the Mixed-Use and Warehouse District priority sites. Remediation for this area will include sludge removal from drying beds for offsite disposal, asbestos abatement, and any subsurface contamination identified during the Phase II evaluation of the area.

Site/Area #2 Mixed-Used District (16.5 Acres, 11-10,000 sq ft buildings) (Parcels 056-1-T-110A, 056-1-115, 056-32-1,056-32-2, 056-1-T-110) Directly to the south of the Dublin municipal offices is the Mixed-Use District priority site, owned by the Town of Dublin. The entire site/area requires an assessment for recognized environmental conditions. Two of the eleven storage buildings have already been renovated—one into an office complex and a store that sells locally made furniture and local goods, another into a machine shop with office space and a hardware store. Nine of the eleven steel and wood storage buildings need asbestos surveys. Phase II assessments may be required due to the historical use of the site for chemical and petroleum storage tanks. Asbestos abatement designs will be developed based on the surveys that will be used to bid abatement services to ready the structures for reuse, as The Town plans to ready the buildings for future tenants.

Site/Area #3 Warehouse District (41 Acres) (Portion of Parcel #056-1-067) Directly south of the Mixed-Use District is the Warehouse District priority site owned by the Town of Dublin, with

a warehouse, blighted boiler building and several vacant areas. The Warehouse District is partially occupied by tenants like Camrett Logistics offering supply chain services in the Main Plant warehouse building. Plans for the Warehouse District include cleanup of a former kerosene tank and asbestos abatement in the boiler building. After assessment and cleanup, future use planning for the site of the former boiler building is essential to increase rental income for Dublin. If the boiler building cannot be reused, it will be removed to free up space for the development of other facilities. Roof repairs on all buildings will allow for future rooftop solar panels. The site already uses two electric trucks used to deliver materials from warehouse to a nearby industry. The Warehouse District will spearhead initiatives to switch from fossil fuel usage to green energy throughout the Industrial Park and will be the incubator site for using renewable energy and energy efficient building options.

Site/Area #4 Future Use Area A (27.4 Acres) (Portion of Parcel #056-1-067, 065-1-170)

Directly south of the Warehouse District is Future Use Area A owned by the Town of Dublin. Assessment measures will include overall site evaluation for potential contaminants and plans to include a walking trail through this tree-covered tract so that those working in the Dublin Industrial Park and others in neighboring low-income communities can enjoy the benefits of a new outdoor recreation facility to increase health and well-being. **An unnamed tributary to Peak Creek is located in Site/Area#4.** There are privately owned parcels adjacent to this area (065-1-97,065-1-96,065-1-93) that will be evaluated to add a water pump station and potentially construct additional low income housing.

Site/Area #5 Future Use Area B (38 Acres)(Portion of Parcel #056-1-067, 056-1-67C, 056-1-111, 056-1-114) East of the Mixed-Use District is a priority site that includes a parcel privately owned by Cullip Services Holdings, Llc. (056-1-67C) and additional parcels owned by the Town of Dublin (056-1-111 and portions of #056-1-067) and the County of Pulaski (056-1-114), known as Future Use Area B. The owners have granted site access for site assessments. The parcel is largely undeveloped, the west side containing a building that operates as an animal shelter (on the parcel owned by the County). Dublin will assess the site for potential contaminants and plan for a future dog park adjacent to the animal shelter, for those working in the Dublin Industrial Park Target Area and those in the surrounding low-income communities to use to increase health and well-being. The site will be evaluated for potentially solar energy production facility.

1.a.iii Identifying Additional Sites: In the event that grant funds remain after addressing the priority sites, Dublin will meet with the Brownfield Task Force consisting of one representative from community groups mentioned in Section 2.b.i and two representatives from the Town of Dublin to identify and prioritize additional sites within the Town of Dublin for selection, based on consideration criteria that include the site's ability to create economic growth and positive change for underserved and disadvantaged census tracts. These additional sites will be presented at quarterly community meetings and ranked for future site selection based on the approved Community Involvement Plan (CIP). Community input garnered from community engagement meetings and activities will inform the final Task Force ranking.

1. b. Revitalization of the Target Area

1.b.i. Overall Plan for Revitalization: The Dublin Industrial Park was an idea conceived by the Mayor of Dublin in 1986. The idea became a reality after the Town obtained the property between 1993 and 1994, followed by annexing the property into the Town limits in 1995. The initial nine parcels occupied by the Dublin Town Center were developed within the first few years. Additional work is needed in order to realize the full economic benefits of the Dublin Industrial Park. The redevelopment of the Target Area is included in the 1999 Comprehensive Plan for the Town of Dublin as an opportunity for manufacturing and other commercial businesses to provide jobs for the residents

of the Town and revenue for Town operations. The revitalization plan is to assess the entire Dublin Industrial Park (as divided into target sites/areas) for potential environmental concerns, and then use assessment data to create a plan for cleanup, renewable energy feasibility studies, and site reuse strategies for the redevelopment of underutilized portions of the priority sites. The Town wants to be able to attract new businesses by transforming the Dublin Industrial Park into a destination to work, shop and eat. Cleanup plans will include asbestos abatement, removal or in situ treatment of wastewater treatment sludge, and removal of contaminated soil in accordance with state regulations. The Pulaski County Economic Development Authority and the Town will work to attract new businesses to the park and expand existing businesses operations. The State of Climate and Resiliency Policy in Virginia (2022) outlines initiatives to progress toward climate resiliency including switching to renewable energy by 2045. The overall plan for Dublin Industrial Park brownfield revitalization will support this agenda by promoting renewable energy and climate resiliency efforts through investigating adaptation and mitigation strategies. The first step will be to assess sites like **Site/Area #4 Future Use Area A** and **Site #5 Future Use Area B** to determine viability for a wind turbine, or a small solar farm, and will include alternative energy feasibility planning for solar/wind energy and will evaluate how to connect energy to the public grid.

1.b.ii. Outcomes and Benefits of Overall Plan for Revitalization: The outcomes of assessment and planning for revitalization are to increase rental income in the Dublin Industrial Park to serve industries in Dublin and the adjacent Pulaski County and create economic opportunities with sustainable living-wage jobs like those at Camrett Logistics, a current tenant in the main plant. The multipurpose grant will support efforts to decrease the unemployment rate and percentage of low-income households by capitalizing on the Target Area’s potential for job creation. Outcomes and benefits of the overall plan for revitalization include planning adaptation measures on each priority site that would increase alternative energy capacity and production which will reduce greenhouse emissions—actions that will collectively make the Target Area more resilient to climate change.

1.c. Strategy for Leveraging Resources

1.c.i. Resources Needed for Site Reuse: The multipurpose assessment grant will provide a basis for and kickstart redevelopment activities. Community partners have been identified and the following resources will encourage the redevelopment and reuse of the priority sites and future sites identified by the community. We will leverage other private or public funds to contribute to the Industrial Park revitalization such as:

- State Brownfield Clean Up Grant (application pending) - \$500,000 for asbestos abatement intended to use at the main plant and boiler house.
- State Brownfield Assessment Grant (application pending) - \$50,000 for assessment of the main plant and boiler house.
- \$250,000 from Virginia Department of Health Lead Elimination Assistance Program (LEAP) for lead service line inventory work through the revolving loan fund with 100% principal forgiveness.

Dublin has secured other leveraged funds. These resources will augment the outcomes of the proposed assessment and remediation projects in a manner that will enhance the Town’s ability to move the priority sites closer to impactful redevelopment. These funds are below:

- Camrett Logistics has already committed 1.5-2 million dollars into increasing jobs at the Industrial Park through building improvements at the main plant for logistic/sequencing activities and is committing more funds to assist with the assessment and redevelopment of the main plant in the Warehouse District to create 58 new sequencing jobs in the Dublin Industrial

Park Target Area. They will provide up to \$6,000 for materials and resource overages, and up to \$2,000 for additional funding for Phase I environmental balances for additional sites.

- National Bank of Blacksburg has committed up to \$10,000 line of credit for the remaining balances for project completion for trail plans and alternative energy planning.
- The Pulaski Board of Supervisors has committed up to \$5,000 to provide resources for clean-up balances and Pulaski County Public Service Authority will provide up to \$10,000 to cover cleanup balances.
- The Town of Dublin Town Council Non-Designated Reserves will provide up to \$20,000 in undesignated reserves for minimal overages to be used at the discretion of the Project Director for projects like the dog park and trail.

1.c.ii. Use of Existing Infrastructure: Assessment activities and reuse planning for priority sites will facilitate the use of existing infrastructure like buildings, roadways, and utilities (electrical power, water, and municipal sewer service) in the redevelopment of the sites for alternative energy planning, recreation, and commercial purposes.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

2.a. Community Need

2.a.i. The Community's Need for Funding: This grant will meet the needs of a community that has limitations on other initial sources of funding through tax revenue due to unemployment and low-income populations to carry out environmental assessment or remediation, planning activities, and subsequent reuse in the Target Area. Dublin's low-income population is in the 61st percentile and the unemployed population is in the 81st percentile (CEJST). According to the Virginia Employment Commission, the poverty rate in Dublin is 21%, exceeding the statewide Virginia poverty rate of 10.7%. As previously mentioned, the town code limits revenue generation to specific taxes and then user fees. The Dublin Industrial Park generates rental income to support the Town's Enterprise Fund to keep fees for water, sewer and garbage low for the low-income residential population. With rental income limited at the Dublin Industrial Park due the park operating at 30% capacity, and this income already supporting the Enterprise Fund, the community lacks funding for brownfield revitalization.

2.a.ii. Threats to Sensitive Populations:

(1) Health or Welfare of Sensitive Populations: According to the Urban Institute, blight such as the brownfield conditions in the Target Area "have been shown to have deleterious effects on area residents, including mental distress (e.g., depression, elevated rates of intentional injury); higher rates of chronic illness (e.g., cardiovascular disease) and mass retreat of area residents into unhealthy eating and exercise habit ("Urban Blight and Public Health", de Leon and Schilling, p.11, 2017). According to Virginia Department of Health Community Health Improvement Data, **Pulaski County is in the New River Health District, 58% of the population is obese, 50% self-report poor mental health, and 22% self-report binge drinking.**

Assessing, remediating, revitalization planning, and projected site reuse in the Target Area will address contaminants that threaten the health of sensitive populations (low-income, the unemployed), create spaces for new higher wage jobs and public park/green space, improve the income status of residents, and reduce legacy pollution, lead paint exposure and toxic air releases such as airborne asbestos.

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions: The blight of brownfields in combination with the lack of economic opportunity means residents suffer from greater than normal incidence of disease and adverse health conditions like obesity, substance abuse, cancers, and poor mental health. The assessment and reuse of the targeted sites would reduce potential

exposure to asbestos, lead, petroleum products, and hazardous substances, all of which have adverse health effects. Redevelopment of the community would result in reductions in blight and enhanced economic opportunities.

There is a greater than normal incidence of disease and adverse health conditions in the Target Area. According to Virginia Community Health Improvement Data, the life expectancy in Pulaski County is 75.8 years, as opposed to 78.69 in the US. Diseases of the heart are 338.77 per 100,000, whereas diseases of the heart in Virginia are 180.81 per 100,000. Malignant neoplasm deaths are 236.4 per 100,000 and 179.13 per 100,000 in Virginia. Malignant neoplasms are cancers caused by gene mutations that may result from exposure to chemicals, carcinogens, radiation, and other causes. These diseases and adverse health conditions are often tied to the potential contaminants assumed present at our Target Sites.

Drug overdose age-adjusted death rates in Pulaski County are 31.5 per 100,000 compared with 19.4 per 100,000 in Virginia. Hospitalizations with substance use disorder rate is 185.5 per 100,000 in Pulaski County and 75.5 in Virginia. Alcohol-involved crash deaths annual rate per 100,000 is 4.1 in Pulaski County and 2.3 in Virginia. The Pulaski County age-adjusted death rate per 100,000 for liver disease is 29.7 and 10 in Virginia. The age-adjusted death rate for deaths by suicide per 100,000 in Pulaski County is 20.5 and 13.4 in Virginia. (Virginia Community Health Improvement Data, 2016-2020 five-year average rates)

In the New River Health District, 18.88% of adults have been diagnosed with asthma compared with 15.99% in Virginia, 17.44% have been diagnosed with prediabetes, compared with 10.06% in Virginia with 2,281.71 hospitalizations for diabetes per 100,000 compared with 1,989 in Virginia. Finally, adults with depressive disorder in the New River Health District is 41.12% compared to 20.73% in Virginia. (Virginia Community Health Improvement Data, Upper CL est).

Pulaski County has a 70.9 per 100,000 incidence of lung cancer, whereas the Virginia lung cancer rate is 53.6 per 100,000, potentially linked to toxic air releases which are in the 86th percentile (CEJST) in the Target Area. There is a greater than normal incidence of disease in the Target Area likely due to environmental contaminants such as those found at the Dublin Industrial Park.

(3) Environmental Justice:

(a) Identification of EJ Issues: The census tract in the Target Area (CT 51:155210600) is in the 64th percentile in the state for diesel particulate matter, the 90th percentile for toxic releases to air, the 58th percentile for lead paint, the 79th percentile for RMP proximity, and the 68th percentile for underground storage tanks, according to EJ Screen supplemental index. **According to CEJST, the low-income population is in the 61st percentile and the unemployed population is in the 81st percentile.** The percentage of those with health conditions are relatively high with those suffering from asthma in the 49th percentile, heart disease in the 71st percentile, and low life expectancy in the 69th percentile. In addition, **there is the presence of one or more abandoned mine land within the tract and the presence of one or more Formerly Used Defense Sites within the tract (CEJST).** Members of sensitive populations (low income, unemployed) whose health is disproportionately affected by the blight of brownfields are particularly vulnerable to the negative consequences of blight and contamination because they are more likely to live near brownfields, be exposed to contamination, and not have adequate health care. **Communities with legacy pollution that are above the 65th percentile for low-income households are considered disadvantaged. The Target Area has legacy pollution (CEJST) and is in the 61st percentile for low-income households which means it is close to the disadvantaged threshold status.** The health and welfare of low-income and unemployed populations are nevertheless impacted by the increased risks of exposure to cancer-causing materials.

(b) Advancing EJ Issues: The proposed projects will advance environmental justice issues by improving air quality, remediating lead and asbestos issues, and increasing climate adaptability by evaluating ways in which to use solar panels and microgrids, adding public park space with native plants and a trail that will connect the Dublin Industrial Park Target Area with the adjacent low-income neighborhood, creating a new energy efficient mobility option. Addressing environmental contaminants will improve the health and well-being of low-income and unemployed sensitive populations in the Target Area. Advancing EJ issues includes embracing input from community members, stakeholders, and residents without regard to race, income and employment status, disability status, age, or gender; by reducing negative impacts of environmental contamination to our sensitive populations while providing job training, living wage jobs, educational opportunities, and the ability to prosper and engage in a higher quality of life.

2. b. Community Engagement

2. b.i. Prior/Ongoing Community Involvement: Dublin hosted a public meeting on September 21, 2023, to introduce the grant initiatives. Business owners, residents, and property owners expressed support for brownfield redevelopment and several groups have volunteered to become part of the Brownfield Task Force. From the award, the Task Force will seek public input and will develop a written Community Involvement Plan (CIP) to document and formalize the process to share information and formalize public input.

2.b.ii. Project Involvement and 2.b.iii. Project Roles:

Organization	Point of contact	Specific Involvement/Role
Pulaski County Economic Development Authority	Michael Solomon msolomon@pulaskicounty.org	Role: Maximize community involvement efforts.
Town of Dublin Town Council	Benny Skeens bskeens@radford.edu	Role: Town Council delegate, point of contact to develop dog park and trail.
Pulaski County Board of Supervisors	Laura Walters lwalters@pulaskicounty.org	Role: Housing and advanced planning expertise for reuse planning.
Pulaski County Community Director	John Crockett jcrockett@pulaskicounty.org	Role: Master planning, scoping for reuse, community liaison.
Virginia Department of Environmental Quality	Leah Harrison lharrison@vedp.org	Role: Environmental and regulatory expertise.
Affordable Housing Developer/Planning/Construction	Tim Price 540-440-0985	Role: Planning affordable housing options on priority sites.
Camrett Logistics	Cameron Peel Cameron.peel@camrett.com	Reuse planning for main plant and boiler house.
Edith and Emmet Hampton	Ew1hampton@mse.com	Community awareness and engagement.
Jonathan Sweet	jsweet@pulaskicounty.org	40 by 30 initiative, affordable housing guidance.
New River Valley Regional Commission, Jennifer Wilsie	Jennifer Wilsie jwilsie@nrvc.org	New River Valley Regional Commission, needs-based planning.

Pulaski County Animal Control	Lisa Turpin 540-674-8359	Design input for dog park at priority site.
Town of Dublin	Deanna Marshall Dmarshall@dublintown.org	Consultation for dog park at priority site from Dublin Industrial Park perspective.

Dublin has a Brownfield Task Force made up of the Town of Dublin and Pulaski County staff and members of several local organizations engaged in revitalization who will support and advance community grant efforts. All members of the Task Force will identify and prioritize additional sites for selection, based on consideration criteria that include the site’s ability to create economic growth, and positive change for underserved and disadvantaged census tracts. Community input will inform the final Task Force ranking.

2.b.iv. Incorporating Community Input: Community input will be sought at quarterly meetings for priority sites and future site selection. All input will inform the Brownfield Task Force’s decisions on priority sites, and additional site selection, and considered to guide plans as appropriate. Written and verbal responses will be provided promptly. These meetings will be in person with a virtual option to keep the community informed of progress, answer resident questions about ongoing work, and obtain information about resident perceptions/concerns. A central printed repository of information will be established at the project office to allow those without computer access to view plans, voice concerns, and provide input toward redevelopment. Responses to community input will be provided at our public engagement meetings and on our social media platforms.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

3. a.i. – v. Description of Tasks/Activities and Outputs:

Task/Activity 1: Planning and Administration
i. Project Implementation: EPA-funded activities for the priority site(s): cooperative agreement implementation and oversight; schedule monthly Task Force meetings and quarterly community meetings; procure Qualified Environmental Professional (QEP); secure non-EPA grant resources contributed, in-kind resources.
ii. Anticipated Project Schedule: Town and Taskforce will perform program management work over the five-year period of the Grant. Project implementation will be over Months 1-6.
iii. Task/Activity Lead(s): Project Director with support from Task Force, QEP, and project staff
iv. Output(s): quarterly reports, finalized CIP, ACRES data entry; notes from monthly Task Force and quarterly community meeting dates, decision on QEP.
Task/Activity 2: Community Engagement
i. Project Implementation: EPA-funded activities for the priority site(s): community engagement activities and meetings using CIP; site selection discussion of EPA-funded activities for the non-priority site(s), if applicable. <i>Non-EPA grant resources contributed</i> , in-kind resources for project team staff effort.
ii. Anticipated Project Schedule: Community engagement will occur throughout the five-year period of the Grant. First quarterly community meeting will occur in the first 3 months.
iii. Task/Activity Lead(s): Project Director with support from Task Force, QEP, and project staff
iv. Output(s): community meeting summary; community input for additional sites, ranking of additional sites based on reuse and redevelopment potential.
Task/Activity 3: Environmental Site Assessments
i. Project Implementation: <i>EPA-funded activities for priority sites(s):</i> Phase I and Phase II Environmental Site Assessments (ESAs) and asbestos surveys for priority sites. Two Phase I ESAs

<p>(one for the town owned properties within the target site and one for the private parcel) and two Phase II assessments at the priority sites. Each of the buildings in the priority sites will have an asbestos survey performed. <i>EPA-funded activities for the non-priority site(s)</i>: Identical work will be completed at sites that are identified in the public engagement and Task Force processes. <i>Non-EPA grant resources contributed</i>: in-kind resources for staff time for oversight of the QEP. If funding remains, the Town will identify other sites to assess based on community input.</p>
<p>iii. Anticipated Project Schedule: Environmental Site Assessments on priority sites and asbestos surveys will occur within 6-18 months with additional sites identified and assessed in months 18-24.</p>
<p>iii. Task/Activity Lead(s): QEP with oversight by the Project Director and Technical Coordinator</p>
<p>iv. Output(s): Phase I and II ESA reports, Asbestos and Lead-Based Paint surveys (as needed); Generic Quality Assurance Plan (QAPP) and five site specific QAPPs. As the project evolves, the Town may also consider developing a GIS based inventory of sites within the City limits that are outside the Target area.</p>
<p>Notes: Given the ages of priority sites, it is anticipated that Asbestos and Lead surveys will be required.</p>
<p><u>Task/Activity 4: Cleanup Planning</u></p>
<p>i. Project Implementation: EPA-funded activities for the priority site(s) will include: Target Area reuse planning and remediation at priority sites; Renewable Energy Feasibility Studies for the target area; Land Use Assessment to analyze local, county, and state land use regulations for priority site reuse; and a brownfields revitalization plan for the Target. The Town would like to include a dog park, walking trails and other aspects to the Dublin Industrial Park to attract high quality employees to work with businesses in the park. EPA-funded activities for the non-priority site(s): identical work will be completed at sites that are identified in the public engagement and brownfields inventory processes, if warranted and as funds allow.</p>
<p>ii. Anticipated Project Schedule: Months 12 through 45</p>
<p>iii. Task/Activity Lead(s): Project Director, Task Force, with assistance from QEP</p>
<p>iv. Output(s): Five Brownfields Analysis of Brownfield Cleanup Alternative (ABCA) plans (one per priority site); reuse planning including feasibility studies for alternative energy, and trail plans for priority sites, site-specific land use assessments, and visual renderings for priority sites; and remediation of priority sites. Note: Proposed planning efforts equal 20% of the budget allocation.</p>
<p><u>Task/Activity 5: Remediation</u></p>
<p>i. Project Implementation: EPA-funded activities for the priority site(s) will include: Cleanup of the former wastewater plant will include removal of sludge and demolition of the structures not intended for reuse. Additional cleanup activities may include removal of contaminated soils identified during Phase II Assessments, remediation of vapor intrusion to the existing structures, and abatement of asbestos. Contamination identified during the Phase II site assessments will be addressed using the Virginia Voluntary Remediation Program. <i>Non-EPA grant resource contributions</i>.: in-kind resources—planning department/economic development staff.</p>
<p>ii. Anticipated Project Schedule: Months 12 through 45</p>
<p>iii. Task/Activity Lead(s): Project Director, Task Force, with assistance from QEP, remediation contractor procurement</p>
<p>iv. Output (s): Design a Sludge Characterization, Management and disposal Plan for Site 1,</p>

Asbestos Abatement for Sites 1-3, Virginia Voluntary Remediation Program Application and Documents for entire Target Area.

3. b. Cost Estimates: The following estimates are based on similar projects and input from the Region 3 TAB provider.

Task 1 – Programmatic Personnel costs: 48 hrs @ \$50.00/hour = **\$2,400** Procurement (10 hrs), outreach activities (30 hrs), and EPA program reporting (8 hrs). Remaining programmatic activities will be accomplished with leveraged funds. Travel costs: Attendance for one person to attend National Brownfield Conference: **\$1,800** (per person: \$400 Airfare, 3 nights hotel \$600, 4 days per diem and airport transfer/local transit \$500, registration fees \$300) Contractual: 240 hours at \$120 per hour over five years (**\$28,800**) for consultant assistance on technical summaries for quarterly reports, updating EPA ACRES, monthly progress meetings, and outreach activities throughout term of grant.

Task 1 Total: \$33,000

Task 2 – Community Engagement: Contractual: 400 hours (over five years) at \$100 per hour (**\$40,000**) for QEP support to develop a Community Involvement Plan and support community-wide meetings, meeting planning, outreach, focus groups, and visioning sessions as well as for meetings with site owners and potential developers. *GRANTEE and QEP are experienced in online virtual community engagement activities.* **Task 2 Total: \$40,000**

Task 3 – Assessment: Contractual: QEP to conduct Environmental Site Assessment activities: 2 ASTM-AAI compliant Phase I ESAs covering the entire five priority sites/areas for **\$15,000**; one Generic Quality Assurance Plan (QAPP) with updates = **\$7,500**; and 5 Phase II ESAs (approx. \$25,000-50,000 per site, *costs vary due to the complexity of sites, assuming \$30,000 average*) = **\$150,000**. **Task 3 Total: \$172,000**

Task 4 – Planning and Remediation: Develop five ABCA cleanup plans and remediate priority sites to reduce health & environmental risks for selected sites. Community vision and input will continue to be considered in planning. Reuse planning including feasibility studies alternative energy, stormwater master planning, and trail plans for priority sites with renderings for five priority sites/areas set fee = **\$200,000**.

Task 5 – Remediation: Regulatory Coordination and Project Management estimated **\$25,000**. Construction/Remediation Manager Field Oversight estimated **\$42,000**. Remediation Contractor Site Preparation/Soil Erosion, Sediment Control and stormwater management estimated **\$78,000**. Remediation Contractor Removal, Transportation Disposal of impacted soil piles/sludge material estimated 500 Tons @ \$100/ton = **\$50,000**. Clean soil placement and grading estimated 500 Tons @ \$100/ton = **\$50,000**. Remediation Contractor Asbestos abatement = **\$270,000**. Preparation and submittal of Virginia Voluntary Clean up Program Application and Program Documents for Target Site estimated **\$45,000** **Task 5 Total: \$555,000**

Budget Table						
Project Tasks	<u>1: Programmatic</u>	<u>2: Community Engagement</u>	<u>3: Assessment</u>	<u>4: Planning</u>	<u>5. Remediation</u>	Total
Travel	\$1,800					\$1,800
Personnel	\$2,400					\$2,400
Contractual	\$ 28,800	\$40,000	\$172,000	\$200,000	\$555,000	\$995,800
Category subtotals	\$33,000	\$40,000	\$172,000	\$200,000	\$555,000	\$1,000,000

3. c. Plan to Measure and Evaluate Environmental Progress and Results: The Project Director with support from key staff and the QEP will document, track, and evaluate the following outputs and outcomes continually through quarterly progress reports, annual disadvantaged business enterprise reporting, and monthly communication with the EPA Project Officer. The activities and outcomes are tracked through a project management and invoice management system.

Outputs: Number of sites assessed (Phase I/II ESAs); comprehensive brownfield inventory with reuse plans; number of ABCAs; number of formal community meetings; Community Involvement Plan; ACRES entries; alternative energy feasibility studies; trail feasibility plans.

Outcomes: Number of sites with completed assessments and remediation/cleanup plans; and buildings positioned for adaptive use; amount of private investment and other funding leveraged; jobs created or retained; increased property and sales tax revenue generated. An overall gauge of success will be the creation of jobs, increased climate resiliency through the transition to alternative energy sources, and the improvement in environmental justice conditions through trail planning and job provisions. These successes will be tracked through the growth of property and sales tax revenues captured in annual Town budgets. In the event the project is not being completed efficiently, countermeasures are in place. The project team will evaluate the project progress semi-annually against the goals in Section 3.a and, if goals are not being met or are off schedule, will meet with local stakeholders and the QEP to discuss the shortcomings and adjust the project approach and schedule, as needed. The team will continue to coordinate with our Project Officer to address any issues that arise and develop a corrective action plan to ensure project goals are met.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

4.a. Programmatic Capability

4.a.i-iii Organizational Capacity, Organizational Structure, and Description of Key Staff

Project Director: Tyler F. Kirkner, B.Arch., Dublin Town Manager, has over 40 years of experience and will serve as the Project Director. In addition to his responsibilities as Town Manager, he manages the Dublin Industrial Park including building inspections. Tye Kirkner has 12 years of experience managing VDOT grants of over a million dollars, federal ARPA grants over 2.6 million dollars, CDBG grants, and municipal grants.

Deputy Project Director: Darrin Cullip, Assistant Manager for the Town of Dublin, will serve as Deputy Project Director. He currently oversees all utilities, sanitation, and facilities. His experience in project management at VDOT will support all aspects of the project scope and schedule.

Finance Director: Rebecca Wright will serve as the project finance director. With over 40 years of experience in public sector finance, Rebecca will manage all financial aspects and reporting for the multi-purpose grant, including bookkeeping, financial reporting, accounts payable, receipts, reconciliations, and any necessary audits.

Technical Director: Mr. Earl Hagee, Assistant Superintendent to public works for the Town of Dublin. With two decades of experience in overhead and underground utilities, he has been a project manager on many large-scale construction projects and will ensure that the town's procedures and objectives are achieved.

Contract Management: Kimberly Dalton is the Assistant Treasurer for the Town of Dublin, Virginia. She will bring two decades of financial experience to assist Rebecca Wright in monitoring the grant contract from beginning to end, managing contracts and subcontracts.

4.a.iv. Acquiring Additional Resources: To successfully administer this grant project and obtain the necessary brownfields expertise, the Town of Dublin will secure the services of a professional and experienced Brownfield QEP through a fair and open bid process that complies with

state and federal requirements (2 C.F.R. 200 and EPA rule 2 C.F.R. 1500). The Town of Dublin will promote strong labor practices and local hiring/ procurement by utilizing local contractors for asbestos abatement where possible and the local landfill for disposal of contaminated investigative derived waste.

4.b. Past Performance and Accomplishments

4.b.ii. Has Not Received an EPA Brownfields Grant but has Received Other Federal or Non- Federal Assistance Agreements

(1) Purpose and Accomplishments:

Grant	Amount	Purpose	Accomplishments
Rural Waterline Replacement (FY 2008-current). State grant funded by Virginia Rural Water Association	\$5,600,000	Waterline replacement for fire safety	Accomplishments include: waterline replacement (almost complete). There is a \$1,600,000 grant balance and grant work is ongoing.
Title VI, American Rescue Plan Act (ARPA) (FY 2022-2024). Federal grant administered through Pulaski County.	\$2.6 million	Offset effects of Covid through infrastructure improvements, funding to prevent layoffs, ease burden on disadvantaged citizens.	Grant award June 2021 and is 100% allocated funds. Accomplishments include: improvements to the town’s sewer system; offset Covid revenue losses by preventing layoffs; short term help with utility bills for disadvantaged citizens; roof replacements in the Dublin Industrial Park for tenant in main plant.

(2) Compliance with Grant Requirements: Project staff has a history of timely compliance with all federal/state grants. The Town closely monitors grant project progress with no adverse findings to date. All grant terms and conditions are met promptly and by set work schedules. Reports and financials have been submitted promptly to date and applicable grants have been closed. No adverse findings were reported about grant awards/financial assistance programs, internal controls or audits, compliance, or any other matters as per the grant agreement. For grant purposes, the Town of Dublin has a financial manager who can perform all necessary audit tasks for the grant.

Town of Dublin, Virginia
FY24 EPA Brownfields EPA Multipurpose Threshold Criteria

1. Applicant Eligibility

The Town of Dublin, Virginia is a general-purpose unit of local government and therefore an eligible entity as defined under 2 CFR § 200.64 pursuant.

2. Community Involvement

The Town of Dublin acknowledges that broad-based support and community participation in the process will be essential to ensure the overall acceptance and success of the Brownfield Program, and we recognize that it is essential to include community residents and stakeholder input throughout all phases of project planning, decision-making, and implementation. To guide this process, a formal Community Involvement Plan will be updated and adopted within 60-90 days of issuance of the cooperative agreement for the grant. The CIP will utilize existing channels of communication, stakeholder relationships, and innovative strategies to ensure meaningful input is infused into all grant activities. Our project partners have committed to serving on the Brownfield Taskforce, which will meet monthly (with an online video conferencing option) The Brownfield Taskforce will establish site prioritization criteria and be actively involved in all grant funded activities. Each partner has also committed to assisting with outreach/engagement activities.

Communications with other Key Stakeholders: The Town of Dublin and our partners regularly communicate with property/business owners, developers, and other non-profit and community-based organizations, including through monthly town meetings that are hosted and advertised on social media. The Town of Dublin will create informational brochures and fact sheets which will be available via a dedicated project webpage. The webpage will be linked to project partner websites to ensure information is readily accessible throughout the community. We have established social media outlets that can be utilized to ensure that residents and other community stakeholders stay informed and feel included in what is happening at the Dublin Industrial Park. This menu of engagement methods will enable a wide range of stakeholders to provide meaningful input. Sustained outreach will ensure that assessment and cleanup conclude with strong community backing. All meetings will have a virtual attendance option.

3. Target Area

The Dublin Industrial Park is in south Dublin, just north of I-81 is the Target Area. (37°05'49.5"N 80°41'24.3"W). Dublin is located in southern Virginia, south of the Jefferson National Forest. The Target Area is in Census Tract 51155210600, a large Census Tract covering areas within the Town of Dublin town limits and Pulaski County

4. Affirmation of Brownfield Ownership The Town of Dublin is the sole owner of four priority brownfield sites that meet the CERCLA § 101(39) definition of a brownfield. A 5th priority site is partially owned by the Town of Dublin (Portion of Parcel #056-1-067, 056-1-111, 056-1-114) and Cullip Services Holdings, LLC (Parcel 056-1-67C). Site access has been granted by the owner but due to grant requirements, cleanup activities will not be conducted on this parcel.

5. Use of Grant Funds A breakdown of anticipated ESAs by site number is as follows:

- Conducting a Phase I ESA for all Town of Properties within Sites 1-5

- Conducting 5 Phase II ESAs (one at each priority site/area).

A summary of the cleanup activities by site is as follows:

- Creating a Site-Specific Reuse Plan for Site 1-5.
- Performing a Renewable Energy Feasibility Study for entire Target Area.
- Design a Sludge Characterization, Management and disposal Plan for Site 1.
- Brownfields Analysis of Brownfield Cleanup Alternative (ABCA) plans for Site 1-5
- Asbestos Abatement design for Sites 1-3
- Virginia Voluntary Remediation Program Application and Documents for entire Target Area

6. Expenditure of Existing Grant Funds

The Town of Dublin does not have an open EPA Brownfields grant.

7. Contractors and Named Subrecipients

Named Contractors – Not applicable.

Named Subrecipients- Not applicable.