



1. Applicant Identification

Southwest Arkansas Planning and Development District, Inc.  
101 Harvey Couch Boulevard  
Magnolia, Arkansas 71753

2. Funding Requested

- a. Grant Type: Single Site Cleanup
- b. Federal Funds Requested: \$2,000,000

3. Location

a) City of El Dorado b) Union County c) Arkansas

4. Property Information

Former Warner Brown Hospital (West Wing)  
470 West Oak Street  
El Dorado, Arkansas 71730

5. Contacts

a. Project Director

Jimmy Parker, Special Projects Officer, Brownfield Project Manager  
870-234-4030  
Jimmy.parker@arkansas.gov  
101 Harvey Couch Boulevard  
Magnolia, Arkansas 71753

b. Chief Executive/Highest Ranking Elected Official

Renee Dycus, Executive Director  
870-234-4030  
Renee.dycus@arkansas.gov  
101 Harvey Couch Boulevard  
Magnolia, Arkansas 71753

6. Population

City of El Dorado – 17,800 (US Census 2017–2021 American Community Survey)

7. Other Factors

<b>Other Factors</b>	<b>Page #</b>
Community population is 10,000 or less.	3
The applicant is, or will assist, a federally recognized Indian Tribe or United States Territory.	N/A
The proposed brownfield site(s) is impacted by mine-scarred land.	N/A
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the remediation/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation.	N/A
The proposed site(s) is adjacent to a body of water (i.e., the border of the proposed site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	N/A
The proposed site(s) is in a federally designated flood plain.	N/A
The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	2
The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures.	2
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	2
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.	N/A

8. Releasing Copies of Applications

Not Applicable.

## 1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

### a. **Target Area and Brownfields** i. Overview of Brownfield Challenges and Description of

**Target Area:** The Southwest Arkansas Planning and Development District (SWAPDD) encompasses 12 counties and 65 cities in southwest Arkansas. One of the largest municipalities in the SWAPDD Region is the city of El Dorado (City). The county seat of Union County (County), with a population of 17,800, is known as Arkansas’s Original Boomtown.<sup>1</sup> The City has a rich history as a nationwide producer of petroleum and timber products and a world-class provider of bromine, which is used in fire retardants and related products. Founded in 1843, the City began as a small farming community. From the early to mid-1920s, the City’s economy spiked as the discovery of oil caused the population of the small agricultural town of 4,000 to grow to nearly 30,000.<sup>2</sup> El Dorado became known as the oil capital of Arkansas, housing 59 oil contracting companies, 13 oil distributors and refiners, and 22 production companies.<sup>2</sup> Furthermore, the onset of World War II prompted several chemical and munitions facilities to move to the city, and the first industrial development organizations were created, attracting a large-scale poultry processing plant that became the largest employer in El Dorado.<sup>3</sup> In the 1950s, the discovery of bromine in the oil field brines created even more job opportunities in Union County.<sup>4</sup> However, these former thriving businesses could not withstand the economic hardships that followed. The end of World War II meant the closing of several chemical and munitions plants, and by the 1960s, the oil industry was in decline. Approximately 1,200 jobs were subsequently eliminated, which devastated El Dorado’s economy and forced residents to search for job opportunities elsewhere.<sup>5</sup> Economic hardships and their related **brownfield challenges** are still present today, evident in the trending decline in population, which has decreased every decade since the 1960s.<sup>2</sup> Residents who have remained in the area have had to endure a steady rise in crime and poverty.

The **geographic boundary** for this application is the **El Dorado city limits, with a target-area focus on Census Tract (CT) 05139950800, which is surrounded by Justice40 Initiative Disadvantaged CTs**. This target area is a focus for City and County leadership because of its sensitive populations and its central location and proximity to schools, including Barton Junior High School and South Arkansas College. The need for affordable housing is a significant welfare concern for this area. The need is evident by the high vacant housing rate and high homeowner vacancy rate. In addition to affordable housing concerns, the target area suffers from a high crime rate and has a high percentage of sensitive populations including minorities, the impoverished, women, youth, and elderly residents. Residents in the target area also suffer significant economic disparities, with a significant number of residents living with low income and below the poverty level. Cleanup of asbestos-containing materials (ACMs) and lead-based paint (LBP) hazards will remove a significant community health concern. This EPA Brownfield Cleanup Grant will be used to abate/remediate ACM and LBP in the **West Wing of the Former Warner Brown Hospital**. This will allow for the renovation and the City/County’s planned reuse of the priority site as apartment/dormitories and public support space, alleviating the social burden on residents.

ii. Description of the Proposed Brownfield Site: The West Wing of the Former Warner Brown Hospital is situated (“West Wing”) on an approximately 2.715-acre tract located at 470 West Oak Street, El Dorado, Arkansas, within CT 9508. It has sat vacant since 2015 and includes an approximately 80,620-square-foot West Wing (initially developed in 1921, with additions in the

<sup>1</sup> 2017–2021 American Community Survey – US Census

<sup>2</sup> El Dorado (Union County)-Encyclopedia of Arkansas, Central Arkansas Library System (CALs)

<sup>3</sup> The History of El Dorado-goeldorado.com/history

<sup>4</sup> Bromine-Encyclopedia of Arkansas, CALs

<sup>5</sup> Statements of Public Hearings of the Commission on Population Growth and the American Future -Vol. VII of Commission Publications, 1972.

1940s–1950s). The East Wing of the Former Warner Brown Hospital is an adjacent property and is **NOT** part of the cleanup site. Previous Phase I and Phase II Environmental Site Assessments (ESA) have been conducted at the West Wing site. ACMs and LBP were identified to be present. Materials used in the construction and renovations of the West Wing in the 1950s include ACMs and LBP. Thirty-seven (37) homogenous materials have been identified as ACM and twenty-six (26) LBP surfaces (interior and exterior) were identified. Abatement and/or stabilization of ACMs and LBP will need to be completed prior to renovations taking place.

**b. Revitalization of the Target Area** i. Reuse Strategy and Alignment with Revitalization Plans SWAPDD’s 2019–2024 Comprehensive Economic Development Strategy (CEDS) has identified population decline and lack of available housing as the two biggest threats in this community. The CEDS discusses the need to address existing housing issues. Removing blight and restoring older buildings are priorities in CEDS; however, before the restoration of older buildings can take place, contamination from asbestos and lead paint on existing building materials must be addressed.

The West Wing has already had an environmental assessment that identified asbestos and lead. The next step is to remediate the hazardous building materials for redevelopment. However, the remediation cost is going to be significant, and no existing funding is currently available to pay for the remediation. Abatement of ACM was previously conducted at the East Wing, which is now being converted into a 911 call center, mass vaccination space, and a Crisis Stabilization Unit, where residents having a mental crisis can stay for up to 72 hours and receive needed mental health care. Now, the City and County would like to see the West Wing renovated with the intended reuse as dormitories and apartments for use by students at South Arkansas College and as additional space for the Crisis Stabilization Unit, which already occupies a portion of the East Wing. Office use is also being considered for portions of the West Wing. Cleanup and renovation of the West Wing will reduce blight in the area, help create educational opportunities, add jobs, and lead to more private investment in the area.

ii. Outcomes and Benefits of Reuse Strategy: As it exists today, the West Wing is vacant and continues to deteriorate from lack of use and lack of routine maintenance activities. If the West Wing does not receive cleanup funds, it will continue to decay. With cleanup funding, ACM and LBP can be properly addressed and pave the way for renovation and beneficial reuse of the site for desperately needed student housing and social service support space. Renovation of the West Wing will decrease crime and blight in the area (noneconomic benefit), contribute to more higher education opportunity (noneconomic benefit), add construction/remediation jobs (economic benefit), and lead to more private development of the area (economic benefit). **Potential for release of ACM and LBP from climatic change (significant weather events) will be reduced by this cleanup**, thus providing a layer of protection to local residents and encourage future investment in the target area. **Renovation of the West Wing will incorporate the use of energy-efficient mechanical and lighting systems that reduce overall energy use. Use of solar and geothermal systems is also being considered as part of the overall redevelopment plan.**

c. **Strategy for Leveraging Resources** i. Resources Needed for Site Characterization: SWAPDD will not need additional funding for site assessment and/or characterization of the West Wing. A Phase I ESA (dated January 19, 2023), Phase II ESA (dated June 12, 2023), and Phase I ESA Update (report dated October 25, 2023) have been conducted for Former Warner Brown Hospital Property. An Asbestos Inspection Report (completed December 2015/January 2016) and a Lead Based Paint Inspection Report (dated January 6, 2016) were also prepared for the site. Based on the results of these prior assessments, the Former Warner Brown Hospital West Wing is

contaminated with hazardous substances: ACMs and LBP. Cleanup Grant funds will be used for cleanup of ACM and LBP in the West Wing.

ii. Resources Needed for Site Remediation: SWAPDD is applying for \$2 million in Cleanup Grant funds to provide the necessary funding to remediate ACM and LBP at the Former Warner Brown Hospital West Wing. This will be adequate funding and will allow for the necessary remediation of the West Wing to take place.

iii. Resources Needed for Site Reuse: Funding sources for the initial planning and coordination of the redevelopment planning will stem from SWAPDD and the City and County. After the environmental cleanup has occurred, the plan is to begin renovation of the building for potential use as dormitories/apartments. Additional funds available to the City and County for reuse of the site include, but are not limited to, Community Development Block Grant (CDBG), USDA Rural Development (Community Facilities Program), Economic Development Administration (EDA), issuance of Act 9 Bonds, and Southern Arkansas College private funding. Overall, the City, County, and SWAPDD will continue to apply for state and federal grant opportunities as they become available for redevelopment purposes.

iv. Use of Existing Infrastructure: The cleanup and redevelopment plan for renovation of the West Wing will use existing infrastructure (roads, power, water, sewer) as they are all sufficient for construction and reuse in the target area and at the priority site, due to the renovation being completed in the East Wing for the 911 Call Center.

## **2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT**

a. **Community Need** i. The Community's Need for Funding: The target area has a small population (3,136) and a high rate of poverty (14%) compared to both the state of Arkansas (11%) and nationally (9%).<sup>6</sup> With a median household income of **\$41,831** and per capita income of \$24,081, the City of El Dorado ranks well below both the state of Arkansas (\$52,123/\$29,210) and national (\$69,021/\$37,638) averages.<sup>6</sup> The percentage of El Dorado resident's dependent on food stamps/SNAP (15%) is also well above the Union County, state of Arkansas, and national average of 11%.<sup>6</sup>

High poverty rates are leading to a lower tax base, resulting in the City's and County's lack of available funding for environmental cleanup of the West Wing. Although the City, County, and SWAPDD do not have discretionary funding to pursue cleanup activities on their own, both routinely apply for federal and state funding for projects to supplement existing City and County programs. Furthermore, SWAPDD is not able to fund this remediation on their own as they are an organization run by grant funding. EPA Brownfield funding will allow for the remediation of a confirmed hazard in the community, making way for affordable housing options that will benefit students for generations to come.

ii. Threats to Sensitive Populations (1) Health or Welfare of Sensitive Populations: Both El Dorado and CT 9508, have a **high percentage of sensitive populations that include the impoverished, women, minorities, youth, and the elderly**. Elderly citizens in the target area make up 26% of the population (20% US).<sup>6</sup> The City's Black population is 48%, with the target area at 30% (US 13%).<sup>6</sup> El Dorado's population under the age of 18 is 26% (US 23%) with 44% of those in the target area living in poverty (US 17%).<sup>6</sup> The population of female householders with no spouse present living in poverty is 55% in the target area and 33% in El Dorado (US 25%).<sup>6</sup> In addition, 23% of all people in the City and 19% of the target area live below the poverty line (US 13%).<sup>6</sup>

Welfare issues such as **high poverty rates lead to higher criminal activity**. The 2020 (most recent) crime index rate for El Dorado was 675, which was 2.6 times the national average and

<sup>6</sup> 2017–2021 US Census American Community Survey

higher than almost 99% of all US cities.<sup>7</sup> Since 2014, crime rates in El Dorado have been at least double the national average. El Dorado's violent crime rate in 2020 was 796 compared to the 228 national average, and the property crime rate was 568 compared to the 170 national average.<sup>7</sup> The high crime rates in the area create a strain on the police department, and due to the low tax base, there is limited opportunity to hire additional staff to help mitigate the crime. Crime will be reduced when venues for criminal activity are removed, allowing for redevelopment and prosperous growth of the area. Renovation of the West Wing into student housing and apartments in combination with a nearby law enforcement presence (East Wing 911 Call Center) will result in an increased amount of quality housing and an overall reduction in crime, which will lead to neighborhood stability and ultimately more prosperity.

Welfare issues such as **lack of affordable housing** within the target area and city limits is affecting the residents. Within the target area, the homeowner vacancy rate is double the national average at 2.7% with the rental vacancy rate for both the target area and the City at 11% (US 6%).<sup>8</sup> Within the City, the average monthly rent is \$725 (US \$1,163), and the average median value of a home is \$93,500 (US \$244,900).<sup>8</sup> Even with the low cost of monthly rent and low home values, the community is suffering as a significant portion of their annual income goes to cover housing costs. To make matters worse, existing housing within the target area and City is aged, with 73% of all homes being constructed prior to 1979, creating an environmental concern of **asbestos and lead**.<sup>8</sup> The Environmental Justice (EJ) Screen Report **Lead Paint indicator** reports the target area in the **83<sup>rd</sup> percentile** in the state. Vacant and underused properties created from the loss of commercial and industrial businesses has produced an economic and social drain, resulting in gradual disinvestment and high levels of poverty in the target area.

Using EPA Brownfield funds to remediate contamination and reduce the threat to sensitive populations will be the first positive step toward redevelopment through planned affordable housing development. In addition, cleanup of this site will support public health, providing space for a Crises Stabilization Unit, where residents having a mental crisis can get the desperately needed mental health services they need. Having law enforcement presence in the 911 Call Center in the adjacent East Wing will provide a significant level of safety for sensitive populations, a critical step needed to re-establish this community.

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions: Sensitive populations are the most at risk when it comes to disease and health conditions that are created by brownfield sites, such as the Former Warner Brown Hospital. Lead paint and asbestos exposure, associated with older structures (commercial and residential), pose an increased risk to the target area's minorities, children, elderly, and those living in poverty. Further exacerbating this issue is the cleanup site's proximity to additional hazardous sites. The target area (for the state) is in the **97<sup>th</sup> percentile for Superfund proximity, 90<sup>th</sup> percentile for RMP facility proximity, 79<sup>th</sup> percentile for hazardous waste, 91<sup>st</sup> percentile for underground storage tanks and the 97<sup>th</sup> percentile for wastewater discharge**.<sup>9</sup>

Lead paint and asbestos exposure typically associated with aging structures pose increased risks to the target area's children-living-in-poverty residents. The target area ranks in the **83<sup>rd</sup> percentile in the state for lead paint indicator**.<sup>9</sup> Lead exposure can result in severe health and developmental consequences in **infants and children**, and asbestos exposure can result in many forms of **cancer** and breathing problems such as **asthma**. Union County has a significantly higher

<sup>7</sup> <http://www.city-data.com/crime/crime-El-Dorado-Arkansas.html>

<sup>8</sup> 2017–2021 US Census American Community Survey

<sup>9</sup> EPA EJ Screen Report

cancer rate (488 per 100k) than that of the US (442 per 100k) and Arkansas (467 per 100k), which aligns with the **target area being in the 99<sup>th</sup> percentile for air toxics cancer risk.**<sup>10, 11</sup> Asthma and other respiratory diseases are also a major concern for the target area, as it is in the **99<sup>th</sup> percentile for toxic releases to air and 92<sup>nd</sup> percentile for air toxics respiratory hazard statewide.**<sup>11</sup> The Climate and Economic Justice Screening Tool ranks the target area **in the 55<sup>th</sup> percentile statewide weighted percentage of people told they have asthma.** These factors contribute to a low life expectancy, with the target area ranking in the 79<sup>th</sup> percentile nationally.<sup>11</sup> Without the EPA Brownfield Grant funding, the City and County will be unable to remediate ACM and LBP or mitigation these serious health concerns affecting the underserved population.

(3) Environmental Justice (a) Identification of Environmental Justice Issues: Sensitive populations in the target area are not experiencing economic opportunity due to the high number of vacant buildings, high vacancy rate, and a declining tax base. The target area is a prime example of an underserved community according to the Biden Administration Justice40 Initiatives with high poverty rates (14%), high crime rates (2.6 times the national average), and racial segregation (30% Black residents).<sup>12</sup> According to EJ Screen Report, within the target area 31% of the population is considered low income, and 16% have less than a high school education. In addition to poverty, the many EJ Screen Report Pollution and Sources EJ issues are creating a very bleak situation for residents. Levels of particulate matter are in the 88<sup>th</sup> percentile both statewide and nationally, traffic proximity is in the 84<sup>th</sup> percentile, and the air toxic cancer risk is extremely high, ranking in the 99<sup>th</sup> percentile in the state and the 94<sup>th</sup> percentile nationally.<sup>11</sup> President Biden’s Justice40 Initiatives, such as **reducing the EJ burden, decreasing the number of abandoned and blighted properties, creating new and affordable housing, and creating new jobs for the community** will be addressed with this brownfield funding and subsequent remediation.

(b) Advancing Environmental Justice: The renovation of the West Wing will benefit the target area by decreasing the amount of vacant building space and replacing it with affordable student housing units. In turn, more housing will lead to increased opportunity for residents to enroll in higher learning. Cleanup of the ACM and LBP from the West Wing will also remove a significant source of contamination for the site area thus reducing overall health risk to the area’s sensitive populations. **None of the planned redevelopment discussed in this grant application will displace residents or businesses, as the West Wing is not currently in use.** The City, County, and SWAPDD will employ redevelopment strategies that will prevent/minimize the potential of any future displacement for businesses or residents with any future redevelopment throughout the target area.

**b. Community Engagement** i. Project Involvement & ii. Project Roles: The following have been identified by SWAPDD as project partners who will assist in the process of future redevelopment of the brownfield sites.

Name of Org	Point of Contact	Specific involvement in the project or assistance provided
South Arkansas Community College	Interim President- Stephanie Tully-Dartez, PhD <a href="mailto:stully-dartez@southark.edu">stully-dartez@southark.edu</a>	South Arkansas College is a community college that promotes excellence in learning, teaching, and service to the community; provides lifelong educational opportunities; and serves as a cultural, intellectual, and economic resource for the community. South Arkansas College is exploring plans to fund

<sup>10</sup> CDC State Cancer Profiles – National Cancer Institute

<sup>11</sup> EPA EJ Screen Report

<sup>12</sup> 2017–2021 US Census American Community Survey

		the renovation of West Wing for use as college dormitories/apartments.
El Dorado Chamber of Commerce	Kaitlyn Rigdon <a href="mailto:kaitlyn@goeldora.com">kaitlyn@goeldora.com</a> 870-863-6113	The El Dorado Chamber of Commerce promotes economic development of El Dorado and Union County and will assist in engaging legislative bodies regarding future reuse of properties, informing local businesses on project status.
Civitan Club of El Dorado	Mike Dumas [REDACTED]	A volunteer organization of clubs serving individual and community needs with a special emphasis on helping those with developmental disabilities. Civitan Club will assist in outreach by informing local businesses and volunteer organizations on Brownfield Project status.

iii. **Incorporating Community Input:** SWAPDD informed the public of their intent to pursue an EPA Brownfield Cleanup Grant for the West Wing through local publications and on their website on October 27, 2023. SWAPDD has already been working within El Dorado’s community for several years on their Brownfields Community-wide Assessment program. SWAPDD plans to conduct several community meetings throughout the grant lifecycle to educate target-area residents, project partners, and stakeholders on the Brownfield Cleanup Program, **especially those underserved residents directly impacted by the project.** Meetings will be held to explain the cleanup project and give progress updates throughout the process. Input from target-area residents will be gathered and recorded in meeting minutes then evaluated during SWAPDD/project partner meetings. Responses to community input will be posted to the SWAPDD’s Brownfield Program webpage and/or will be responded to individually within two weeks of receipt.

SWAPDD will prepare a Community Involvement Plan (CIP) that will describe the project background, planned engagement activities, schedule, and key players involved in the Brownfield Project. The CIP will be available for public review at SWAPDD’s office and on their Brownfields Program website. Public and partner feedback will be encouraged and discussed internally. Responses will be posted to the SWAPDD Brownfield Program website and/or discussed at the next engagement activity.

SWAPDD understands the importance of using several forms of media to communicate Brownfield Program information to ensure a wide reach throughout the district. The newly revised SWAPDD website and Facebook page have reached a growing audience due to the increase in usage, creating a solid platform for sharing Brownfield Program information. Additionally, SWAPDD will hand out flyers explaining the project, which will be distributed at community events and placed at City and County offices. Upcoming City and County meetings, meeting minutes, materials from past brownfield meetings, and project updates will be posted on SWAPDD’s website and Facebook page. Press releases to the local media will keep the community and the district updated on Brownfield Project milestones.

**3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS**

**a. Proposed Cleanup Plan:** A draft Analysis of Brownfield Cleanup Alternatives (ABCA) was prepared for the Former Warner Brown Hospital West Wing due to its impact from ACM and LBP. Based upon effectiveness and cost considerations, it was determined that pre-renovation removal/abatement of ACM and LBP is the best recommended procedure to address the asbestos and LBP concerns at the West Wing. **As part of the cleanup process, barriers and signage will be put in place to ensure the safety of residents at all work sites.** Conventional removal/abatement of ACMs and LBP will be performed using standard industry practices. Abatement areas will be contained prior to the removal using polyethylene sheeting, controlled



negative pressure conditions, and/or other applicable measures to prevent asbestos fiber migration and LBP beyond the work zone.

ACM removal will be performed by an Arkansas-licensed abatement contractor. This work requires a 10-business day notification to the ADEQ Asbestos Section and appropriate coordination with ADEQ representatives, as needed, throughout the abatement project. An air monitoring program will be required for removal of friable or highly damaged ACM. Final clearance would be granted following a visual examination of the work area, followed by receipt of acceptable air quality testing results for regulated ACM.

Lead is regulated by the Arkansas Department of Health (ADH) and US EPA through the United States Occupational Safety and Health Administration (OSHA). As such, lead safe work practices will be required. US EPA, ADEQ and ADH regulations would also apply for disposal of lead-containing waste. Occupational exposure to lead occurring in the course of construction work, including renovation activities, painting, alteration, and repairs is subject to the OSHA lead standard (29 CFR 1926.62). The Resource Conservation and Recovery Act (RCRA) requires the waste generator to determine if the LBP wastes are hazardous.

**b. Description of Tasks/Activities and Outputs**

<b>Task 1: Outreach</b>	
i.	<i>Project Implementation:</i> SWAPDD will develop a Community Involvement Plan (CIP), outreach materials, Brownfield Project website, and social media posts with the assistance of the environmental contractor (EC). SWAPDD staff will lead the community meetings to keep the public informed on project plans and updates. Supplies are budgeted for the printing of outreach materials (brochures/handouts), office supplies, and software to manage the grant.
ii.	<i>Anticipated Project Schedule:</i> CIP created within three months of award. Community meetings held in the 1 <sup>st</sup> quarter of each year of the grant. Website and outreach materials created in the 1 <sup>st</sup> quarter and posted monthly throughout the grant project.
iii.	<i>Task/Activity Lead:</i> SWAPDD – Jimmy Parker, Brownfield Project Manager
iv.	<i>Outputs:</i> CIP, Brownfield Website, 4 Community Meetings, Brochures/Handouts, Social Media Posts, Summary of Community Meetings in EPA-required Quarterly Reports.
<b>Task 2: Programmatic Support</b>	
i.	<i>Project Implementation:</i> SWAPDD will procure an EC. The Brownfields Project Manager will oversee grant implementation and administration to ensure compliance with the EPA Cooperative Agreement Work Plan, schedule, and terms and conditions. SWAPDD will complete ACRES Database Reporting, Yearly Financial Reporting, Quarterly Reporting, MBE/WBE Forms, and all additional programmatic support for the four-year term of the grant. SWAPDD staff travel budget allows for two staff to attend three national/regional/grantee brownfield training conferences/workshops.
ii.	<i>Anticipated Project Schedule:</i> ACRES Reporting begins in the 1 <sup>st</sup> quarter, and Quarterly Reporting begins in the 2 <sup>nd</sup> quarter and continues throughout the grant project. Yearly Reporting and Forms are created in the 5 <sup>th</sup> , 9 <sup>th</sup> , and 13 <sup>th</sup> quarters and during final closeout.
iii.	<i>Task/Activity Lead:</i> SWAPDD – Jimmy Parker, Brownfield Project Manager
iv.	<i>Outputs:</i> ACRES Database Reporting, 4 Yearly Financial Reports, 16 Quarterly Reports, 4 MBE/WBE Forms, Programmatic Support for the four-year grant period. Two staff to attend three conferences.
<b>Task 3: Cleanup/Reuse Planning</b>	

i.	<i>Project Implementation:</i> SWAPDD’s Brownfields Project Manager will oversee the EC as they finalize the ABCAs and Abatement Designs and prepare QAPPs and Health and Safety Plans (HASP).
ii.	<i>Anticipated Project Schedule:</i> The above documents will be created within three months of award.
iii.	<i>Task/Activity Lead:</i> The EC will handle the technical aspects of the project with oversight from SWAPDD – Jimmy Parker, Brownfield Project Manager.
iv.	<i>Outputs:</i> 1 ABCA, 1 Abatement Designs, 1 Site Specific-QAPP & HASP
<b>Task 4: Cleanup Oversight</b>	
i.	<i>Project Implementation:</i> SWAPDD’s Brownfield Project Manager will oversee the EC as they provide oversight of proposed site cleanup activities, perform asbestos air monitoring, clearance sample analysis, and cleanup reporting. (Not included under construction costs as services provided via separate contract)
ii.	<i>Anticipated Project Schedule:</i> Oversight will be performed following the same schedule as cleanup activities.
iii.	<i>Task/Activity Lead:</i> The EC will conduct cleanup oversight of the project.
iv.	<i>Outputs:</i> 2 cleanup oversight jobs created (annualized), 1 cleanup closeout report
<b>Task 5: Cleanup</b>	
i.	<i>Project Implementation:</i> SWAPDD’s Brownfield Project Manager, with assistance from the EC, will oversee the abatement contractor as they perform site cleanup activities including contractor mobilization, abatement and/or encapsulation of ACM and LBP, and disposal.
ii.	<i>Anticipated Project Schedule:</i> Abatement activities will begin within 9–12 months of award and will be completed within 9–12 months after initial abatement activities.
iii.	<i>Task/Activity Lead:</i> The abatement contractor will implement the cleanup plan with oversight from SWAPDD – Jimmy Parker, Brownfield Project Manager
iv.	<i>Outputs:</i> 1 site ready for reuse, 10 remediation jobs created (annualized)

**c. Cost Estimates:** Below are the anticipated cost estimates for this project *based on past brownfield projects as determined by local market standards with contractual hourly rates based on the skills needed for the specific tasks.* The budget for this project includes personnel, fringe, travel, supplies, construction, and contractual costs only. The average Personnel rate will be \$53/hour with a fringe rate of \$7/hour.

**Task 1 Outreach:** Contractual: Community Involvement Plan \$4,000 (32hrs x \$125). Personnel: Brownfield Website, Outreach Brochure/Handouts, Social Media Posts \$1,500 (25hrs x \$60); 4 Community Education Meetings \$2,400 (40hrs x \$60; \$600/meeting). Supplies: Outreach Supplies (software, printouts, etc.) \$800. **Task 2 Programmatic Support:** Personnel: ACRES Database Reporting, Yearly Financial Reporting, Quarterly Reporting, MBE/WBE Forms, Programmatic Support for the four-year grant period \$10,800 (180hrs x \$60). Travel: Two staff to attend three conferences \$9,600 (flights at \$550, 3 nights in hotel at \$250/night, incidentals and per diem at \$100 [3 days] 2 attendees x 3 conferences). **Task 3 Planning:** Contractual: 1 ABCA at \$6,500 (52 hrs x \$125; 1 abatement specifications report at \$10,500 (70hrs x \$150). **Task 4 Cleanup Oversight:** Contractual: Abatement oversight, air monitoring, and clearance sampling at \$144,000 (120 shifts x \$1,200/shift). **Task 5 Cleanup:** Construction: Abatement and disposal of ACM and LBP by licensed contractor: \$1,810,000 (based on prior bid from abatement contractor).

Category	Tasks					Totals
	<i>Outreach</i>	<i>Programmatic Support</i>	<i>Planning</i>	<i>Cleanup Oversight</i>	<i>Cleanup</i>	
Personnel	\$3,471	\$9,540				\$13,011
Fringe Benefits	\$429	\$1,260				\$1,689
Travel		\$9,600				\$9,600
Supplies	\$800					\$800
Contractual	\$4,000		\$16,900	\$144,000		\$164,900
Construction					\$1,810,000	\$1,810,000
<b>Total Budget</b>	<b>\$8,700</b>	<b>\$20,400</b>	<b>\$16,900</b>	<b>\$144,000</b>	<b>\$1,810,000</b>	<b>2,000,000</b>

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

**4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE**

**a. Programmatic Capability** i. Organizational Structure & ii. Description of Key Staff:

Southwest Arkansas Planning & Development District (SWAPDD) serves 12 contiguous counties and 65 municipalities located in the southwest corner of the state. The District is positioned at the juxtaposition of Louisiana to the south and Texas to the southwest and is often described as the “ArkLaTex” region. SWAPDD serves a population of more than 241,000 residents and includes five municipalities with a population of 10,000 or more. SWAPDD staff are very familiar with successfully managing federal- and state-funded grant projects for their jurisdiction. The team, described below, and their supporting staff are more than adequate and capable to successfully manage this Brownfield Cleanup Grant.

SWAPDD’s Administrator and **Brownfields Program Director, Ms. Renee Dycus**, will be responsible for the timely and successful expenditure of funds and completion of administrative and financial requirements of the project. **Mr. Jimmy Parker serves as the Brownfield Project Manager** for the SWAPDD’s Brownfield Program, and **Mr. Blake Harrell is the Quality Assurance Manager**. They will be assisted by **Ms. Christina Tate, SWAPDD accountant**.

Ms. Dycus has over 35 years of overall management experience in all aspects of district operations including management of SWAPDD staff, programs, and operations. Mr. Parker has over 15 years of district management experience and is responsible for grant writing, grant administration, community planning, special projects, and community outreach. Mr. Parker will be the primary point of contact for this grant project. With over 20 years of experience, Mr. Harrell is the Director of Community and Economic Development and is SWAPDD QA Manager for the grant programs. He is responsible for staff oversight as well as economic development planning, project development, grant preparation, and grant administration. Mr. Harrell will assist Mr. Parker

in managing this cleanup project. Ms. Tate has worked in the accounting field for 13 years with 9 years small business and 4 years nonprofit. Her duties have included all aspects of payroll, federal and state reporting, tax reporting, accounts payable, accounts receivable, account reconciliation, quarterly budget reports, financial reporting, and grant compliance. She will be responsible for managing the finances of the grant and completing the drawdowns through the ASAP.gov system. These key staff members successfully managed the FY13 and FY20 Brownfield Assessment Grants. A qualified environmental contractor will assist with the technical and reporting portions of the project.

iii. Acquiring Additional Resources: Using local contracting requirements and procurement process, SWAPDD will procure a qualified environmental contractor to assist with technical and reporting portions of the Brownfield Cleanup Grant, in addition to any other contractors needed to complete the project. SWAPDD will ensure compliance with the EPA's "Professional Service" procurement process. SWAPDD will promote strong practices, local hiring, and will link members of the community to potential employment opportunities for all brownfield-related redevelopment via community outreach practices and project updates to project partners.

**b. Past Performance and Accomplishments** i. Currently Has or Previously Received an EPA Brownfields Grant: (1) Accomplishments: SWAPDD was awarded and successfully managed the FY2013 \$400,000 EPA Brownfields Assessment Grant and is currently executing a FY2020 \$300,000 EPA Brownfields Assessment Grant managed under the same project management team identified above. SWAPDD has been successful in meeting all reporting requirements and completing technical reports. Under the FY2013 assessment grant, SWAPDD completed 20 Phase I and 20 Phase II ESAs throughout the District, which were accurately reported in ACRES. Assessed under the FY2013 Brownfield Assessment Grant, the former Howard County Hospital received two grants under the Arkansas Department of Environmental Quality Abatement Grant to aid in the cleanup and abatement of the former hospital.

SWAPDD was awarded and continues to successfully manage the FY2020 \$300,000 EPA Brownfields Assessment Grant, under the same project management team identified above. SWAPDD has been successful in meeting all reporting requirements and completing technical reports. Under the FY2020 assessment grant, SWAPDD has completed 14 Phase I and 11 Phase II ESAs throughout the district, which were accurately reported in ACRES. Under the FY2020 Brownfield Assessment Grant, the former Warner Brown Hospital property in El Dorado has undergone both Phase I and Phase II ESAs.

(2) Compliance with Grant Requirements: SWAPDD maintained compliance with the work plan, scheduling, and terms and conditions issued under the FY2013 Grant agreement throughout the grant period. The grant was extended for an additional year to use remaining funds for site assessment and planning. All grant award administration, including yearly and quarterly reporting, deliverables, and ACRES reporting were maintained and completed in a timely manner. The full award of funds issued under the grant were expended and closed in 2018.

SWAPDD has maintained compliance with the work plan, scheduling, and terms and conditions issued under the FY2020 Grant agreement throughout the grant period. The grant has been extended for an additional year to use remaining funds for site assessment and planning. All grant award administration, including yearly and quarterly reporting, deliverables, and ACRES reporting have been maintained and completed in a timely manner. Of the full award of funds issued under the grant, 59% has been expended, however, due to the year 2020 COVID Pandemic a one-year extension was requested and approved.



**Southwest Arkansas Planning and Development District  
FY24 Brownfields Cleanup Grant  
Threshold Criteria**

## Threshold Criteria

### 1. Applicant Eligibility

- a. Southwest Arkansas Planning & Development District, Inc. (SWAPDD) is eligible to apply for the EPA Brownfields Cleanup Grant as a nonprofit organization as described in section 501(c)(3) of the Internal Revenue Code. Please see attached 501(c)(3) nonprofit documentation.
- b. SWAPDD is not exempt from Federal taxation under section 501(c)(4) of the Internal Revenue Code.

### 2. Previously Awarded Cleanup Grants

SWAPDD affirms that the Former Warner Brown Hospital (West Wing) site located at 470 West Oak Street, El Dorado, Arkansas has not received funding from a previously awarded EPA Brownfields Cleanup Grant.

### 3. Expenditure of Existing Multipurpose Grant Funds

SWAPDD affirms that they do not have an open EPA Multipurpose Grant.

### 4. Site Ownership

SWAPDD acquired the property on November 13, 2023, through Special Warranty Deed.

### 5. Basic Site Information

- a) Site Name: Former Warner Brown Hospital (West Wing)
- b) Site Address: 470 West Oak Street, El Dorado, Arkansas 71730

### 6. Status and History of Contamination at the Site

- a) The Former Warner Brown Hospital (West Wing – 2.715 acres) is contaminated with hazardous substances: asbestos-containing materials (ACMs) and lead-based paint (LBP). Cleanup Grant funds will be used for cleanup of ACM and LBP.
- b) The Former Warner Brown Hospital (West Wing) is located on an approximately 2.715-acre tract of land and includes an approximately 80,620-square-foot building (initially developed in 1921, with additions in the 1940s–1950s). The Former Warner Brown Hospital (West Wing) has been vacant since 2015.
- c) Previous Phase I and Phase II Site Assessments have been conducted at the site. ACMs and LBP were identified at the Former Warner Brown Hospital (West Wing).
- d) Materials used in the construction and renovations of the building include ACMs and LBP. Thirty-seven (37) homogenous materials have been identified as ACM, and twenty-six (26) LBP surfaces (interior and exterior) were identified.

### 7. Brownfields Site Definition

SWAPDD affirms the site is:

- NOT listed (or proposed for listing) on the National Priorities List (NPL);
- 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
- NOT subject to the jurisdiction, custody, or control of the U.S. government.

**8. Environmental Assessment Required for Cleanup Grant Applications**

The following site assessment reports have been completed for the site at 470 West Oak Street:

- Phase I Environmental Site Assessment, December 23, 2015
- Asbestos Inspection Report-40 (West) Wing, December 2015/January 2016
- Lead Based Paint Inspection Report, January 6, 2016
- Phase I Environmental Site Assessment, January 19, 2023
- Phase II Environmental Site Assessment, June 12, 2023
- Phase I Environmental Site Assessment Update, October 25, 2023

**9. Site Characterization**

a. **Not Applicable.**

b. **Not Applicable.**

c. For an applicant other than a State or Tribal Environmental Authority that is proposing a site that is not eligible to be enrolled in a voluntary response program or State or Tribal equivalent oversight program (e.g., sites contaminated with hazardous building materials):

- i. See attached letter from Arkansas Department of Environmental Quality (ADEQ) indicating that asbestos and/or lead paint abatement activities are not eligible for enrollment in the Elective Site Cleanup Agreement (ESCA) Program (voluntary response program);
- ii. An Environmental Professional has certified that there is a sufficient level of site characterization from the environmental site assessments performed to date for the remediation work to begin on the site.

**10. Enforcement or Other Actions**

SWAPDD is not aware of any ongoing or anticipated environmental enforcement actions relating to the site for which Brownfields Grant funding is sought.

**11. Sites Requiring a Property-Specific Determination**

SWAPDD affirms that the site does not require property-specific determination to be eligible for EPA Brownfields Grant funding.

**12. Threshold Criteria Related to CERCLA/Petroleum Liability**

**a. Property Ownership Eligibility – Hazardous Substance Sites**

**i. EXEMPTIONS TO CERCLA LIABILITY**

**(1) Indian Tribes**

Not Applicable.

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

Not Applicable.

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

Not Applicable.

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

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

Not applicable.

**iii. LANDOWNER PROTECTIONS FROM CERCLA LIABILITY****(1) Bona Fide Prospective Purchaser Liability Protection****(a) Information on the Property Acquisition**

- (i) Transfer from another governmental unit
- (ii) November 13, 2023
- (iii) Special Warranty Deed
- (iv) Union County, Arkansas
- (v) SWAPDD has a relationship with Union County insofar as it serves to apply and administer federal grants for 12 Counties & 65 Cities in Southwest Arkansas, of which Union County is one.

**(b) Pre-Purchase Inquiry:**

- (i) The following environmental site assessments have been prepared for the site prior to SWAPDD's ownership:
  - Phase I Environmental Site Assessment dated December 23, 2015, prepared by Impact Environmental, Inc. for Warner Brown Building, LLC
  - Asbestos Inspection Report-40 (West) Wing dated December 2015/January 2016, prepared by Snyder Environmental for Warner Brown, LLC
  - Lead Based Paint Inspection Report dated January 6, 2016, prepared by EEG for Snyder Environmental
  - Phase I Environmental Site Assessment, January 19, 2023, prepared by Terracon Consultants for SWAPDD
  - Phase II Environmental Site Assessment, June 12, 2023, prepared by Terracon Consultants for SWAPDD
  - Phase I Environmental Site Assessment Update, October 25, 2023, prepared by Terracon Consultants for SWAPDD
- (ii) Merrick Rotenberry, Professional Geologist (PG) – Project Manager for Terracon Consultants, performed the Phase I and Phase II Environmental Site Assessments. Mr. Rotenberry is an Environmental Professional as defined in Section 312.10 of 40 CFR.
- (iii) The most recent Phase I ESA and ESA Update were conducted by Merrick Rotenberry (PG), Project Manager. At the time of the ESA report, Mr. Rotenberry stated that to the best of his professional knowledge and belief, he met the definition of Environmental Professional as defined in Section 312.10 of 40 CFR. This Phase I ESA/ESA Update was conducted within 180 days of the acquisition of the property.

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

All disposal of hazardous substances at the site occurred before SWAPDD acquired the property. SWAPDD has not caused or contributed to any release of hazardous substances at the site. SWAPDD has not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.

**(d) Post-Acquisition Uses**

Since obtaining ownership of the site, the site has not been used or occupied by



SWAPDD or other parties. SWAPDD has a relationship with Union County insofar as it serves to apply and administer federal grants for 12 Counties & 65 Cities in Southwest Arkansas, of which Union County is one.

(e) Continuing Obligations:

- (i) There are no known continuing releases at this time. SWAPDD has taken steps to prevent the spread of asbestos and lead-based paint by securing and limiting access to the West Wing. The site has been equipped with security fencing.
- (ii) The West Wing has been secured with locked doors and windows, which remain intact and will be routinely monitored. SWAPDD will exercise appropriate care with hazardous substances found at the site by taking reasonable steps to prevent any threatened future release. SWAPDD plans to use cleanup funds to abate ACM and LBP at the West Wing.
- (iii) The West Wing has been secured with locked doors and windows, which remain intact and will continue to be routinely monitored. Abatement of ACM and LBP will prevent potential exposure to asbestos and LBP at the site.

SWAPDD confirms its commitment to:

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

**13. Cleanup Authority and Oversight Structure**

- a. The site is not currently, nor will it be, enrolled in ADEQ's ESCA due to the nature of contamination (asbestos and lead paint), as these contaminants are not addressed by the ESCA Program. The Arkansas Department of Health (ADH) oversees the Arkansas Lead-Based Paint-Hazard Regulation, which sets forth certification, licensing, and training requirements for those persons and firms who perform lead-based paint abatement activities and training in the state of Arkansas. EPA retains oversight authority over ADH's Lead-Based Paint Program. The ADEQ Air Division – Asbestos Section is the cleanup authority for asbestos. Standard Notice of Intent (NOI) and a certified Project Design will be submitted in accordance with ADEQ Regulation 21 prior to commencement of field activities. If necessary, US EPA will also be consulted in order to ensure that the asbestos cleanup is protective of human health and the environment.

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

- b. The site is accessible on all sides from public roads. Based on the nature and location of the identified contamination on the subject property, it is not anticipated that neighboring property access is necessary for proposed cleanup/abatement activities.

#### **14. Community Notification**

##### **a. Draft Analysis of Brownfield Cleanup Alternatives**

A Draft ABCA and draft Cleanup Grant application were made available through the SWAPDD website on October 25, 2023, to allow the community to provide input and comment. The draft ABCA is included as an attachment.

##### **b. Community Notification Ad**

A community notification ad was placed on the City of El Dorado website, SWAPDD website, El Dorado News-Times website, the El Dorado Chamber of Commerce website on October 25, 2023. The ad announced the following:

- The grant application and draft ABCA were made available through the SWAPDD website, and the documents also available for review at the Union County Courthouse, located at 101 N Washington St, El Dorado, AR;
- Project Staff can be contacted should there be public input or comment;
- The public meeting was held on November 7, 2023 at 5 p.m. at the Union County Courthouse, located at 101 N Washington St, El Dorado, AR; and
- Public comments were accepted until November 9, 2023, at 6 p.m.

##### **c. Public Meeting**

A public meeting to discuss the Cleanup Grant application and Draft ABCA was held on November 7, 2023, at 5:00 PM at the Union County Courthouse located at 101 N Washington Street, El Dorado, Arkansas. Comments were accepted until November 9, 2023, at 6 p.m.

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

- Meeting sign-in sheet;
- meeting notes from the public meeting;
- a summary of the public comment received;
- the applicant's response to the comments;

##### **d. Submission of Community Notification Documents**

See attached.

#### **15. Contractors and Named Subrecipients**

##### **Contractors**

Not Applicable.

##### **Named Subrecipients**

Not Applicable.



**Southwest Arkansas Planning and Development District  
FY24 Brownfields Cleanup Grant  
Threshold Criteria  
Eligibility Documentaiton**



**DIVISION OF  
ENVIRONMENTAL QUALITY**

Sarah Huckabee Sanders  
GOVERNOR

Shane E. Khoury  
SECRETARY

October 24, 2023

Electronic Mail Only

Blake Harrell  
SWAPDD Inc.  
101 Harvey Couch Blvd.  
Magnolia, Arkansas 71754

**RE: Letter of Support for Federal Fiscal Year (FY) 2024 EPA Brownfields  
Cleanup Grant Application**

Dear Mr. Harrell:

The Division of Environmental Quality Office of Land Resources (DEQ) acknowledges that the Southwest Arkansas Planning and Development District (SWAPDD) plans to conduct the cleanup of a brownfield site and is applying for an EPA Brownfields Cleanup Grant in FY 2024.

SWAPDD has developed an application requesting site-specific federal Brownfields Cleanup funding for the Former Warner Brown Hospital located at 470 West Oak Street, El Dorado, Arkansas.

DEQ affirms that the Former Warner Brown Hospital:

- i. Is eligible to be enrolled in the DEQ voluntary cleanup program;
- ii. Is not currently enrolled, and SWAPDD does not intend to enroll the site in the voluntary cleanup program;
- iii. Has had a sufficient level of site characterization from the environmental site assessments performed to date for the remediation work to begin on the site.

DEQ has determined that the estimated cost for cleanup of this site exceeds \$250,000, the maximum amount that DEQ can spend per site cleanup according to the terms of DEQ's Section 128(a) State and Tribal Response Program grant. Therefore, DEQ cannot assist SWAPDD Inc. in cleaning up the site and an EPA Brownfields Cleanup Grant is needed.

For any questions regarding this letter, please contact Addie Smith at (501) 682-0616 or by email at [addie.smith@arkansas.gov](mailto:addie.smith@arkansas.gov).

Sincerely,

A handwritten signature in black ink that reads 'ASmith'.

Addie Smith, Brownfield Program Coordinator  
Division of Environmental Quality