



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

NARRATIVE INFORMATION SHEET

1. Applicant Identification:

Oak Pointe Centre, Post Office Box 259, Somerset, KY 42501
(501(c)3 nonprofit organization)

2. Funding Requested:

a. Grant Type: Single Site Cleanup

b. Federal Funds Requested: \$XXX,XXX

Commented [c1]: Insert total amount of grant request

3. Location:

- a. City: Somerset
- b. County: Pulaski
- c. State: Kentucky

4. Property Information:

Former Palm Beach Factory, 419 Bourne Avenue, Somerset, KY 41311

5. Contacts:

a. Project Director:

Brenda Russell, Phone number 606-305-1033

Email: oakpointecentre@gmail.com

Mailing address: P. O. Box 259, Somerset, KY 42501

b. Chief Executive/Highest Ranking Elected Official:

Jeremy Cole, Board Chairman, Phone number: 606-875-2331

Email: jeremy.cole@pulaski.kyschools.us

Mailing address: P. O. Box 259, Somerset, KY 42501

6. Population: City of Somerset population: 11,954 (census.gov)

7. Other Factors: Not Applicable

8. Releasing Copies of Applications: Not Applicable; the application does not contain confidential, privileged, or sensitive information.

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

a. Target Area and Brownfields

i. Background and Description of Target Area:

The City of Somerset, is the seat of Pulaski County, Kentucky. Although, formed many years before, Somerset did not begin to grow until the Southern Railroad was completed in 1875. A thriving community, given the name of South Somerset, developed near the depot. Railroad employees and travelers brought many business and additional interests to Somerset's "South End." Some of the principal streets were High and Depot Street, and Griffin and Bourne Avenues. A number of industrial establishments followed by the mid-twentieth century in the immediate vicinity of Somerset. Among the largest was the Palm Beach Company.

Discuss the brownfield challenges and their impact on the city.

Provide a brief overview of how this grant will potentially help address those challenges and impacts.

Identify and describe the specific target area where you plan to perform the grant activities, such as a census tract.

ii. Description of the Brownfield Site:

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

b. Revitalization of the Target Area

i. Reuse Strategy and Alignment with Revitalization Plans:

Oak Pointe Centre describes itself "a multipurpose community facility focused on providing space for education and support services to assist those living in poverty overcome barriers to self-sufficiency and a higher quality of life." Once the building has undergone abatement of environmental hazards and renovation is complete, Oak Pointe Centre will lease space to local non-profits at below market value. God's Food Pantry, a free or very low-cost clothing center, and a feeding center/soup kitchen that serves hot, nutritious meals will be Oak Pointe's anchor nonprofits. In 2021, God's Food Pantry served more than 10,000 Pulaski County residents with 75,000 supplement food services, and have outgrown their existing space. The remaining 45,000 square feet on the upper level will be subdivided in approximately 20 additional spaces for lease to other entities dedicated to help move poverty-stricken families forward in their lives. These will include a life-skills education center, a

financial education/banking partner, a medical clinic, counseling services, addiction services, shower and laundry facilities for the homeless, and other related services. Oak Pointe has already been in discussion with and received positive feedback from many of these organizations. The non-profits will benefit from the reduced cost rent. Some local nonprofits have lost their leases recently because the landlords can charge higher rents to for-profit interests. Being under the same roof will increase the cooperation between these organizations and led to additional client referrals. Those in need of assistance will benefit the most by having a “one-stop service center” rather than a dozen different locations all over the county. Transportation is a barrier for many low-income residents.

The lower level will be converted to restaurant, a meeting space that will be made available to the community, and the majority will be used as a warehouse for Our Place, another 501(c)3 non-profit that works with over 90 regional nonprofits. Oak Pointe will recruit a restaurant with a similar business model as DV8 located in Lexington, Kentucky. The restaurant that will function as a second chance employer for those in addiction recovery. The employees will receive a living wage while they gain experience as cooks and servers. Once they are trained and have a positive work history, they can gain traditional employment.

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

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

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

Commented [c2]: Confirm this is true following the meeting

ii. Outcomes and Benefits of Reuse Strategy: Each job created is important in a rural community like The City of Somerset. The removal of contamination and the proposed redevelopment will create or support construction related jobs. Computer training, budget and credit counseling, and addiction recovery programs will greatly impact the recipient’s economic future and the area’s workforce. The reduce of blight at the property will reduce blight and is a potential catalyst for redevelopment of other nearby properties. As explained above, the planned reuse of the of former Palm Beach factory will create a property with the dedicated use for nonprofit purposes in the target area. Renovation will incorporate energy efficient features including green insulation such as polystyrene or cellulose, double or triple-pane and low-emissivity windows, LED lighting, high efficiency HVAC systems, and energy efficient water heaters. The proposed project will not cause the displacement of residents or businesses.

c. Strategy for Leveraging Resources

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

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

Commented [c3]: Insert these figures from new ABCA
Cleanup costs are less than the total grant request

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

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

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

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

a. Community Need

i. The Community's Need for Funding: This grant will meet the needs of the community by fully funding the cleanup of a property contaminated with hazardous substances that will not occur otherwise. Oak Pointe Center is unable to draw on other sources of funding to carry out the environmental remediation due to the low-income population. The City of Somerset has a 30.7% poverty rate, which is

more than twice the United States' 11.4% poverty rate. Somerset's median household income (MHI) is \$27,739, which is only 42.7% of the national MHI of \$64,994, (www.census.gov/quickfacts).

ii. **Threats to Sensitive Populations**

(1) *Health or Welfare of Sensitive Populations:*

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

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

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

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

*age-adjusted rate per 100,000 population

(3) *Promoting Environmental Justice:* As previously noted, 30.7% of Somerset residents are at or below the poverty line. The former Palm Beach factory is located in census tract 21199930600. The Climate and Economic Justice Screening Tool identifies census tract 21199930600 as "disadvantaged" in the following three, out of eight, categories: legacy pollution, health burdens, and workforce development. A search of EJScreen.epa.gov, revealed that target area is a food desert, medically underserved and ranks in the top half of the state and nation for the presence of the following pollutants:

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

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

b. Community Engagement

i. and ii. Project Involvement and Project Roles:

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

Partner Name	Point of contact	Specific role in the project
Lake Cumberland Area Development District	Waylon Wright, Executive Director 270-866-4200, Waylon@lcadd.org	Provide grant preparation and administration for additional funding
Lake Cumberland District Health Department	Amy Tomlinson, Executive Director 606-678-4761 amyc.tomlison@lcdhd.org	Conduct health monitoring
Somerset-Pulaski County Chamber of Commerce	Bobby Clue, Executive Director 859-552-3547 bobby.clue@somersetpulaskichamber.com	Promote the project to the business community
Pulaski County Government	Marshall Todd, Judge-Executive Elect 606-875-5327, marshall.todd@twc.com	Committed in-kind staff and equipment to project
City of Somerset	Alan Keck, Mayor, 606-679-6366 akeck@cityofsomerset.com	Committed meeting space and annual financial support
God's Food Pantry	Danita Bush, Assistant Director 606-679-8560 godspantrypulaski@gmail.com	Fully committed future tenant of Oak Pointe Centre
Our Place	Melissa Nevels, Operations Manager 606-802-2009 ourplacewarehouse@gmail.com	Fully committed future tenant of Oak Pointe Centre
Immanuel Baptist Church	Ron Shepherd, Pastor 606-679-3925 shepherdron4@gmail.com	Assist with public education and project notification of target area residents

iii. Incorporating Community Input: Oak Pointe Centre will make every effort to engage the public throughout all phases of clean-up and redevelopment, obtaining public input, and providing informative progress updates. Oak Pointe Centre will solicit, consider, and respond to residents' questions, comments and concerns in regard to the redevelopment activities in their community. The Oak Pointe Centre will follow the EPA's *Steps for Effective Public Involvement* which includes planning and conducting public involvement activities, as well as reviewing and implementing input and providing feedback. Progress will be communicated to the public through a variety of media outlets in order to engage its targeted area and ensure project success. Oak Pointe Centre will use partner agencies, websites, and newspapers to advertise public meetings/webinars and solicit input. Platforms, such as Zoom or Teams, will be used in addition to attending the meeting in-person.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a. Proposed Cleanup Plan

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

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

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

Commented [c4]: Please revise and correct as needed.

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

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

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

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

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

3b. Description of Tasks / Activities, and Outputs

Tasks/Activities:	Task 1 – Cooperative Agreement Oversight
i. Project Implementation	Oak Pointe Centre, with the assistance of LCADD, will oversee grant implementation, including financial and programmatic management to ensure compliance with the cooperative agreement, schedule, and terms and conditions for the four-year grant period. Oak Pointe Centre will initiate a competitive qualification-based selection process in compliance with state and federal (2 CFR 200.317-326) guidelines to select a Qualified Environmental Professional (QEP) firm. With the assistance of LCADD and QEP, Oak Pointe Centre will ensure all quarterly reports, MBE/WBE forms, and the ACRES database updates are completed on time. Oak Pointe City project director will attend regional and national Brownfield conferences.
ii. Anticipated Project Schedule:	This task will be initiated upon grant award and will continue throughout the four-year project period.
iii. Task/Activity Lead(s):	Oak Pointe Centre, LCADD and QEP
iv. Output(s):	4 conferenced attended, 16 Quarterly reports, 1 closeout report, ACRES Updates, annual MBE/WBE reporting
Tasks/Activities:	Task 2 – Community Education & Outreach

i. Project Implementation	This task includes publicity, meetings, and distribution of information to the public as the project progresses. Public/neighborhood meetings will be semi-annually at a minimum and more frequently depending on project process. Supplies needed for public meetings will include printed handout materials and public notices advertised via newspaper. Community Involvement Plan (CIP) will be prepared.
ii. Anticipated Project Schedule:	This task will be initiated within 3 months of grant award and continue throughout the project period.
iii. Task/Activity Lead(s):	Oak Pointe Centre, LCADD, and QEP
iv. Output(s):	A minimum of 8 community meetings, 1 CIP
Tasks/Activities:	Task 3 – Remedial Planning
i. Project Implementation	This task includes preparing the QAPP, Health and Safety Plan, completing the ABCA, coordinating with state and federal regulatory agencies to prepare plans, specifications and bid documents for selection of the cleanup contractor, which will be procured in accordance with federal guidelines (2 CFR 200.317-326).
ii. Anticipated Project Schedule:	This task will be initiated within 3 months after award and completed within 12 months after award..
iii. Task/Activity Lead(s):	Qualified Environmental Professional (QEP)
iv. Output(s):	1 QAPP, 1 ABCA, 1 HASP, remedial plan, 1 set of bid documents.
Tasks/Activities:	Task 4 – Site Cleanup
i. Project Implementation	This task includes anticipated contractor costs for the removing of asbestos containing materials, and flaked lead-based paint, along with proper disposal of all waste materials and the encapsulation of residual lead-based paint. This task will also include QEP oversight of the selected abatement contractor by our selected environmental consultant and air monitoring and asbestos clearance sampling. Health monitoring will be conducted by the Lake Cumberland District Health Department.
ii. Anticipated Project Schedule:	This task will be initiated within 6 months of award and completed within 30 months after award.
iii. Task/Activity Lead(s):	QEP, State Licensed Cleanup Contractor and Health Department
iv. Output(s):	Completion of cleanup, preparation of report and Certification Letter to the USEPA.

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

Budget Categories		Project Tasks (\$)				Total
		Task 1: Cooperative Agreement Oversight	Task 2: Community Education & Outreach	Task 3: Remedial Planning	Task 4: Cleanup	
Direct	Personnel	\$23,040	\$960			\$24,000
	Fringe Benefits					
	Travel ¹	\$6,500				\$6,500
	Equipment ²					

Commented [c5]: Enter contractor costs
I have entered LCADD and Oak Pointe costs
You have \$926,499 left to stay under \$1 million

	Supplies		\$1,000		\$1,000
	Contractual		\$2,000		
	Other	\$36,000	\$4,000		\$40,000
Total Direct Costs³		\$65,540	\$7,960		
Indirect Costs³					
Total Budget		\$65,540	\$7,960		

¹ Travel to brownfields-related training conferences is an acceptable use of these grant funds.

² EPA defines equipment as items that cost \$5,000 or more with a useful life of more than one year. Items costing less than \$5,000 are considered supplies. Equipment is not required for this grant.

³ Administrative costs (direct and/or indirect) cannot exceed 5% of the total EPA-requested funds.

Task 1 – Cooperative Agreement Oversight (\$21,622)

Personnel: \$23,040 Oak Pointe Project Director (12 hours per month x 48 months x \$40/hr = \$23,040);

Travel: \$6,500 grantee training will include attendance of the Oak Pointe project director to four regional or national Brownfield conferences. The budgets include: airfare: one person for four conferences @ \$425 per trip (\$1,700); parking/mileage/taxi \$120 @ 4 trips (\$480); lodging 1 person @ \$220 each night for 4 days and 4 trips (\$3,520); and per diem of \$50 each day for 1 person 4 days and 4 trips (\$800). This budget utilized the most recent national and regional Brownfield conferences to determine budget. **Other: \$36,000** Lake Cumberland Area Development District (LCADD) will assist in procurement, financial management, quarterly reporting and additional programmatic duties throughout grant (15 hours per month x 48 months X \$50/hour = \$36,000).

Task 2 – Community Education & Outreach (\$7,560)

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

Task 3 – Remedial Planning (\$48,000)

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

Task 4 – Cleanup (\$873,000)

This task includes anticipated contractor costs for the removing of asbestos containing materials and flaked lead-based paint, along with proper disposal of all waste materials and the encapsulation of residual lead-based paint. **(\$815,000)**. This task will also include professional oversight of the selected abatement contractor(s) by the QEP and air monitoring and asbestos clearance sampling, cleanup report to the KDEP and USEPA **(\$63,000)**. Additionally, the Lake Cumberland District Health Department will conduct health monitoring in accordance with EPA requirements.

d. Measuring Environmental Results:

Oak Pointe Centre Project Director, Brenda Russell, with assistance from LCADD staff, will be responsible to track the project's progress and ensure the project remains on schedule, within budget, and completed in compliance with all EPA regulations prior to the four year-year performance period. Each quarterly report submitted to EPA will include an update of project expenditures and list the activities accomplished. Additionally, site-specific information will be entered and tracked in the online

Commented [c6]: Update cost – I just made up a number

Commented [c7]: Update total and subtotals – I just made up costs

ACRES database. Anticipated outputs include: 1) community involvement plan, 2) eight community meetings, 3) development of a final ABCA, 4) state- and federally-approved remediation plan, 5) health and safety plan, 6) QAPP 7) bid specifications 8) site remediation, 9) clean up report 10) sixteen quarterly reports 11) successful grant closeout report. Anticipated outcomes that go beyond the grant include 1) a remediated and occupied building 2) jobs created, 3) funds leveraged, 4) more vibrant downtown, 5) improved health among sensitive population, 6) improved on environmental justice issues, 7) enhanced environmental stewardship, 8) on-going community engagement meetings focused on Brownfields. Restoration of the Palm Beach factory will be a catalyst site for other properties.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Programmatic Capability

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

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

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

The Oak Pointe Centre will receive additional administrative support from the Lake Cumberland Area Development District (LCADD), a subrecipient of grant. LCADD, a regional planning council, has successfully assisted the local communities with grant preparation and administration for more than 50 years. LCADD was awarded a FY2018 \$300,000 EPA Community-Wide Assessment Grant. All grant requirements were met including compliance with the work plan, schedule, and terms and conditions. Progress was reported in ACRES including 20 Phase I ESAs, 10 Phase II ESAs, and 10 Site Specific QAPPs. A total of 210.41 acres across eight properties are ready for reuse. The grant was completed over a year ahead of schedule. LCADD is currently the lead applicant and grant administrator for FY2022 \$300,000 Coalition Assessment grant. The project is proceeding on schedule and in compliance with the Work Plan. LCADD's Community Development Specialist, Brendon Kearney, is the project manager for LCADD's current Coalition Assessment grant, and will provide the project management and administration responsibilities for this grant. If the situation arises where Mr. Kearney is unable to continue administering the grant, Ms. Stephanie Smith will take over day to day management of the grant. Ms. Smith has been involved with this project since its inception. Mr. Kearney and Ms. Smith are both certified Community Development Block Grant administrations, and are experienced in managing several other federally grants, such as USDA, ARC, AML and EDA. Mr. Kearney attended the 2022 National Brownfields Conference. Ms. Smith attended the 2022 Florida-Alabama Brownfields conference. Their knowledge and experience will ensure correct and timely reporting and compliance. They are experienced in federal procurement requirements, preparing quarterly, annual and closeout reports, MBE/WBE reporting, submitting payment requests and complying with cooperative

agreements. LCADD has the experience necessary to assist the Oak Pointe Centre in successfully implementing a Brownfield Clean-up grant in compliance with all grant requirements.

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

b. Past Performance and Accomplishments

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

(1) Purpose and Accomplishments:

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

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

(2) Compliance with Grant Requirements:

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

NARRATIVE ATTACHMENT:

Documentation of indicating committed leveraged resources

God's Food Pantry - \$100,000 with an additional \$20,000 per year for 5 years

Pulaski County Government – in-kind use of staff and equipment

City of Somerset – unspecified amount of financial support



P.O. Box 259, 119 S. Central Avenue, Somerset, KY 42501 • 606.679-8560 • gfp8560@gmail.com

Brenda Russell
Executive Director

Board Members

Chris Basil
Jordan Burks
Gary Clark
Jeremy Cole
Josh Edwards
Shannon Ford
Steve Hall
Mike Hornback
Melissa Lancaster
Louise Moore
Kaye Mounce
Mary Oakley
Bruce Parkey
Brenda Popplewell
Ben Purcell
Ron Shepherd

November 2, 2022

To Whom it May Concern,

I am writing this letter to you as a show of commitment and support to the OakPointe Centre Project. I am speaking on behalf of the entire board of trustees for God's Pantry of Pulaski County.

It is our belief that the proposed development of the property at OakPointe Centre will be an asset to the entire region of South Central Kentucky. We pledge to support OakPointe Centre in any way we can including a minimum investment of \$100,000 to start the renovation process. In addition, we commit to an additional \$20,000 per year for the next five years for OakPointe Centre to use as needed.

We know that there are many expenses yet to come so we will assist OakPointe Centre in seeking and writing grants for the remainder of the project.

God's Food Pantry has a 40 year history of serving in our community. We will use all of our experience, connections and resources in order to make sure OakPointe Centre is successfully completed and serving our community.

Sincerely,

Jeremy Cole
President



From: <marshall.todd@twc.com>
Date: Sun, Oct 16, 2022 at 6:41 PM
Subject: Letter of Recommendation
To: gfp8560@gmail.com <gfp8560@gmail.com>

To Whom It May Concern,

As the incoming County Judge Executive of Pulaski County, I would like to express my whole hearted support of God's Food Pantry and the Oak Pointe Centre project in Somerset, Ky. After having met with the Executive Director of God's Food Pantry, Brenda Russell, I am convinced there is a solid plan in place for this project to not only succeed, but to meet the needs of those living in poverty to learn skills to improve their quality of life.

As Pulaski County Judge Executive, along with Fiscal Court, we pledge full support to the Oak Pointe Centre during the construction and remodeling stage in the form of in-kind labor and services, along with providing needed equipment. We will help market and promote events and services that will advance participants in the programs.

I see this project as a means of helping those who struggle with day to day living by providing food, shelter, and personal care to those in our community who desperately need it.

I fully support the mission of God's Food Pantry and ask that you consider awarding them with the requested grant money.

Sincerely,

Marshall Todd
Pulaski County Judge Executive Elect
606-875-5327
marshall.todd@twc.com



306 E. Mt. Vernon St.
Somerset, KY 42501
Phone: 606.679.6366

Alan L. Keck, Mayor
cityofsomerset.com @CityofSomerset.KY @CityofSomerset

P.O. Box 989
Somerset, KY 42502
Fax: 606.679.2481

October 20, 2022

Ms. Brenda Russell
119 S Central Avenue
Somerset, KY 42501

RE: Support for OakPointe Centre

Dear Ms. Russell:

It is my pleasure to write a letter in support of the proposed OakPointe Centre development on behalf of the City of Somerset.

As a longtime supporter of God's Food Pantry, we have full confidence in your ability to lead and impact the lives of many in our community through the OakPointe Centre development. The City of Somerset intends to assist in the initial stages of development by providing a space to host public forums and community meetings. We also commit to providing financial support for OakPointe Centre in addition to funding we already give to God's Food Pantry.

I applaud your efforts to provide a unique service for those who need additional support through feeding, clothing, education, and finance in our city, county, and neighboring counties. Empowering people to improve their current situation in life by providing holistic resources and creating future opportunities for sustainability is a commendable mission. I am proud to support OakPointe Centre and believe it will be an incredible asset to our community.

Sincerely,

Alan Keck
Mayor
City of Somerset

THRESHOLD CRITERIA

1. Applicant Eligibility:

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

2. Previously Awarded Cleanup Grants

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

3. Expenditure of Existing Multipurpose Grant Funds

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

4. Site Ownership

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

5. Basic Site Information

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

6. Status and History of Contamination at the Site

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

7. Brownfields Site Definition

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

- a) listed or proposed for listing on the National Priorities List,
- b) subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA, and
- c) subject to the jurisdiction, custody, or control of the United States government

8. Environmental Assessment Required for Cleanup Grant Applications

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

9. Site Characterization

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

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

10. Enforcement or Other Actions

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

11. Sites Requiring a Property-Specific Determination

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

12. Threshold Criteria Related to CERCLA/Petroleum Liability

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

13. Cleanup Authority and Oversight Structure

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

b. Access to adjacent properties is not anticipated in order to conduct cleanup activities, however, if it is determined that access is needed, the Oak Pointe Centre will work with adjacent property owners to obtain access to their properties.

14. Community Notification

a. The draft Analysis of Brownfield Cleanup Alternatives is attached.

b. Community Notification Ad - attached

On November 3, 2022, the Oak Pointe Centre published the Notice of Intent in Commonwealth Journal newspaper to inform the public of its intent to apply to the United States Environmental Protection Agency for a grant to clean up the former Palm Beach factory located at 419 Bourne Avenue in Somerset, KY. The notice informed the public of the availability of the draft grant application and ABCA for review, and invited comments on the documents.

c. Public Meeting was conducted in-person at an ADA accessible facility on November 14, 2022.

Meeting minutes, included public comments and the applicant's response, along with a roster of attendance are attached.

d. Submission of Community Notification Documents and draft ABCA are attached.

15. Contractors and Named Subrecipients

Contractors – N/A; a contractor has not been procured

Subrecipients – Lake Cumberland Area Development District (LCADD) will be a subrecipient. LCADD will assist the Oak Pointe Centre with financial and project management. LCADD is a regional council established under state legislature (KRS Chapter 147A Section .050), and therefore, eligible for a subaward.

THRESHOLD ATTACHMENTS

Documentation of 501(c)(3) tax-exempt status

Letter from Kentucky Department for Environmental Protection

Community Notification Documents

Draft ABCA



Department of the Treasury
Internal Revenue Service
Tax Exempt and Government Entities
P.O. Box 2508
Cincinnati, OH 45201

OAKPOINTE CENTRE
C/O BRENDA RUSSELL
119 S CENTRAL AVE
SOMERSET, KY 42501

Date:
08/11/2022
Employer ID number:
88-2910174
Person to contact:
Name: Customer Service
ID number: 31954
Telephone: 877-829-5500
Accounting period ending:
December 31
Public charity status:
509(a)(2)
Form 990 / 990-EZ / 990-N required:
Yes
Effective date of exemption:
June 22, 2022
Contribution deductibility:
Yes
Addendum applies:
No
DLN:
26053617002262

Dear Applicant:

We're pleased to tell you we determined you're exempt from federal income tax under Internal Revenue Code (IRC) Section 501(c)(3). Donors can deduct contributions they make to you under IRC Section 170. You're also qualified to receive tax deductible bequests, devises, transfers or gifts under Section 2055, 2106, or 2522. This letter could help resolve questions on your exempt status. Please keep it for your records.

Organizations exempt under IRC Section 501(c)(3) are further classified as either public charities or private foundations. We determined you're a public charity under the IRC Section listed at the top of this letter.

If we indicated at the top of this letter that you're required to file Form 990/990-EZ/990-N, our records show you're required to file an annual information return (Form 990 or Form 990-EZ) or electronic notice (Form 990-N, the e-Postcard). If you don't file a required return or notice for three consecutive years, your exempt status will be automatically revoked.

If we indicated at the top of this letter that an addendum applies, the enclosed addendum is an integral part of this letter.

For important information about your responsibilities as a tax-exempt organization, go to www.irs.gov/charities. Enter "4221-PC" in the search bar to view Publication 4221-PC, Compliance Guide for 501(c)(3) Public Charities, which describes your recordkeeping, reporting, and disclosure requirements.

Sincerely,

Stephen A. Martin
Director, Exempt Organizations
Rulings and Agreements

Letter 947 (Rev. 2-2020)
Catalog Number 35152P

ANDY BESHEAR
GOVERNOR



REBECCA W. GOODMAN
SECRETARY

TONY HATTON
COMMISSIONER

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

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

November 4, 2022

Brenda Russell
Executive Director, God's Food Pantry
P.O. Box 259
Somerset, Kentucky 42502

Re: Letter of Support for a Brownfield Cleanup Grant Application

Dear Ms. Russell:

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

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

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

Sincerely,

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

Eric Eisiminger
Brownfield Coordinator

EE:ee

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

An Equal Opportunity Employer M/F/D

