

Protect Gainesville Citizens, Inc.

Environmental Protection Agency's Technical Assistance Grant (TAG)

Grant Narrative

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Section 1: Group Qualifications

A. Group Eligibility

Yes	No	
	X	Are any members of your group potentially responsible parties (PRPs)?
	X	Was your group established by or does it represent a PRP?
	X	Does anyone in your group have financial involvement in a PRP (other than as an employee or contractor?) Is your group presently sustained by a PRP?
	X	Does your group presently receive money or services from a PRP?
	X	Was your group established, or is it sustained, by an "ineligible entity" (defined in 40 CFR 35.4105).
X		Is your group incorporated (or planning to incorporate) as a non-profit organization for the specific purpose of representing affected individuals at the site?

Protect Gainesville's Citizens, Inc. is incorporated in the State of Florida as a non-profit organization in November 2009. We currently have over 700 Gainesville residents on our contact lists. Regular participants in our bi-weekly Community Involvement Meetings include members from a variety of local neighborhood and citizen groups: Stephen Foster Neighborhood Association, Stephen Foster Protective Group, Gainesville United Neighborhoods, Clean the Gainesville Superfund Site, Students for Clean Water in Gainesville and the local creators of the online resource www.BanCCA.org. Protect Gainesville's Citizens (PGC) formed to unite the many groups and individuals who share concern over public health and safety, property value loss, and other quality of life impacts attributed to the pollution at the Cabot/Koppers site.

B. Responsibility Requirements

1. Administrative and Management Capabilities

While Protect Gainesville's Citizens is a newly formed non-profit organization, our Board of Directors has a combined 29 years of experience in non-profit management. We have a three member Board of Directors: Kaya Ideker, Cheryl Krauth and Erica Merrell. Erica Merrell will serve as our project manager. She has 7 years of experience working for non-profit organizations, including grants processing for the University of Florida's Institute of Food and Agricultural Sciences. She is currently employed as the Executive Director of Friends of Wild Iris. Cheryl Krauth holds an MBA in Entrepreneurship and Venture Capital Financing from the University of Florida. She has 22 years of experiencing working in non-profit and academic settings managing federal and private grants. All three directors are small business owners.

The Project Manager will be the group's designated representative for the purpose of signing all documents related to the TAG. The Project Manager will direct the technical advisor and oversee the entire project. The Board of Directors will be responsible for all financial oversight. The attached bylaws provide additional details about the administrative structure of Protect Gainesville's Citizens.

2. Resources for Project Completion

To complete our technical assistance, we will require the services of a technical advisor. At this time the estimated budget for the entire project will be \$123,544. Of this amount, the federal share will be \$97,922. We will match the federal share of \$97,922 with \$25,622, 20.74% of the total project cost – with a combination of in-kind volunteer services and donated equipment. In-kind contributions will come from donated meeting space, donated office space, website hosting, website design and development services, graphic design services, writing and editing services, legal services, and time required to compile and contact our mailing list. A local bookstore will donate meeting and office space for use by PGC on an as-needed basis throughout the life of the project. Several local freelance writers, newspaper editors, graphic designers, photographers, videographers, web designers, and web developers will design, edit, and maintain a website devoted solely to the Cabot/Koppers site and PGC's technical assistance project. A color copier will be donated to facilitate printing and copying needs. Our Budget Narrative Attachment Form provides a detailed budget including a breakdown of federal and matching shares.

3. Performance Record

Although Protect Gainesville's Citizens has never received federal funding, two of the board members - including the project manager - have worked for other non-profit organizations that have received both private and federal funding. BOD member Erica Merrell's experience includes reporting and analysis of \$250,000 of military-awarded funds. BOD member Cheryl Krauth has 22 years of experience working for non-profit organizations and State of Florida Community College system. She has been responsible for managing several federal and private grant programs all of which successfully met project objectives.

4. Accounting and Auditing Procedures

Our financial management system complies with generally accepted accounting procedures. We have established and maintain a separate bank account and general ledger for the sole management of the TAG. The Project Manager, will maintain all of the financial records related to the grant. These records will be stored in a central file in the office space provided by Wild Iris Books. All contractors and volunteers will be required to keep a signed and verified time log and records of their activities and expenditures.

5. Incorporation

Protect Gainesville's Citizens, Inc. is incorporated in the State of Florida as a nonprofit corporation. A copy of the Article of Incorporation (as filed with State of Florida Division of Corporations) and Bylaws are attached. This document provides a description of the administrative structure of Protect Gainesville's Citizens.

6. Certification

Completed copies of the "Preaward Compliance Review Report for Applicants Requesting Federal Financial Assistance" (Form 4700-4) and the "Certification Regarding Lobbying" are included as required.

C. Group Issues and Objectives

1. How many members of your group are affected by the site?

All of them.

2. Health, Economic and Environmental Effects

Proximity of the Cabot/Koppers site to our city's main water supply – the Murphree Well Field - creates concern about the safety of our public drinking for everyone in the Gainesville area. In addition, those on private wells for drinking water and irrigation have cause for greater concern. The Gainesville Sun, our local newspaper, has reported that contaminants attributed to the site have been found deep within our aquifer in places that were not predicted or expected by our local utility company.

The Gainesville Sun has also reported high levels of contaminants were found in runoff in both Springstead and Hogtown creeks. Members in our group suspect that this may be evidence of ongoing pollution from stormwater at the Cabot/Koppers site. This suspicion has undermined public confidence in federal, state and local agencies to regulate the activities at the site over the last 26 years. The presence of these contaminants also reduces the public's ability to enjoy these creeks. There is consensus in our group that we would like these creeks cleaned up and for the source of their pollution to be eliminated.

Traditionally, the residents in the Stephen Foster neighborhood, just west of the Cabot/Koppers site, have been the most concerned citizens in our community with regard to the site. They have waited and watched over all the activities at the site for the 26 years that it has been on the National Priority List. Many of these residents are suffering, have suffered, or have died from cancer, multiple sclerosis, or other diseases. They are concerned that exposure to site contaminants has caused and is continuing to cause their health problems. Residents of this neighborhood would like to see a complete and comprehensive Human Health Risk Assessment including a study of unusual health clusters including cancer and other diseases.

This neighborhood includes property owners who have lost significant value in their homes. Many of these property owners purchased their homes without any disclosure of proximity to the Superfund site. Included are residents who depend on income from garage apartments or mother-in-law type apartments to pay their mortgage and property taxes. Many have reported losing tenants, or difficulty in attracting new tenants, and are currently at risk of losing their homes to foreclosure. These residents would like their loss of property value and rental income to be addressed.

A number of residents in homes closest to the site received notice from the Alachua County Health Department in May of 2009, stating that they should not allow children under the age of six to play in their yard, due to high levels of dioxin in the soil. This raises concerns about the health of children who have played in the yard in the past and the logistics of relocation without significant property value loss. Some of these people are afraid to lose the community they raised their families in. Others feel trapped in homes which they cannot ethically sell. All are concerned about their personal health. One of these couples has filed a public record stating that they are delaying the conception of their first child until they can find a means to relocate. Neighbors close to these homes question the accuracy of testing and the danger of dioxin exposure in their own yards. Some of these families use their yards to grow vegetables for human consumption. Others would like to, but are unsure if it is safe. These residents need clear, concise and accurate information about the risks associated with the site.

3. Consolidation/Representation

Protect Gainesville's Citizens has a mailing list that includes over 500 individuals living within the city of Gainesville, all of whom are affected by the municipal water supply. We have over 250 fans on our Facebook page, and share information regularly with two other Facebook groups - "Clean the Gainesville Superfund Site" and "Students for Clean Water in Gainesville" - that have 350 and 200 fans, respectively. In addition to students and faculty from the University of Florida, members and officers from the following neighborhood groups have participated in our Community Involvement Meetings: Stephen Foster Neighborhood Association, the Stephen Foster Protective Group, Duckpond Neighborhood Association, Grove Street Neighborhood Association, Gainesville United Neighborhoods, Sierra Club, Friends of Wild Iris and a number of other community groups.

Specific Letters of Support for Protect Gainesville's Citizens are attached and include statements from residents and renters, area business owners affected by soil quality, members of our city and county commissions, representatives from our local utility company, the president of the local Sierra Club, the Board of Friends of Wild Iris, the locally-based creator of the online resource www.BanCCA.org. Each of these letters presents an unique perspective on our community's concerns.

Section 2: Information Sharing

Protect Gainesville's Citizens keeps the community informed about the Cabot/Koppers Superfund site using the following methods of communication:

Internet and Social Networking Sites

Protect Gainesville's Citizens has a website at protectgainesville.org. We've created a Twitter account and Facebook page to promote this website. Subscribers to these two social networking platforms receive updates on additions to the website, as well as reminders for Community Involvement Meetings. Updates to the *Protect Gainesville's Citizens* Facebook page are also manually shared with the subscribers to the *Clean Up the Gainesville Superfund Site* and *Students for Clean Water in Gainesville* Facebook pages. Both the website and social networking sites offer ways for the public to ask questions and share responses.

E-mail

Protect Gainesville's Citizens has gathered e-mail addresses from individuals who are interested in staying informed about activities at the Cabot/Koppers site. We will use email as an inexpensive means to communicate information on the site. Visitors to our website can easily add themselves to this list.

Postcards

Community members who have not provided an email address on our mailing list will be notified of meetings, important events, website and local library repository updates via postcard mailings.

Fact Sheets

In each stage of the technical review process the Technical Advisor will produce a summary fact sheet. These fact sheets can be distributed via the website, e-mail, Facebook and in printed format to ensure everyone has accurate and concise information about the site.

Video

Protect Gainesville's Citizens will produce a series of public service announcement videos. These PSAs will be formatted to play during movie theater previews, as televised commercials, and on YouTube.com, where they can be shared via email, and posted to websites and Facebook pages.

Videos will reach a wider variety of individuals in the community who may not take the time to read a summary fact sheet. They will help clear up "myths" surrounding the site, by providing citizens with accurate, factual information.

Public Document Repositories

All documents produced will be placed in the Alachua County Cabot/Koppers Public Document repository and sent to EPA to be placed in their document repository.

Community Information Meeting

Prior to the public comment period we will hold a community information meeting with a question and answer session. At that time the Technical Advisor(s) will present overviews of each of the significant areas of concern including "Historical Summary and Timeline," "Groundwater Investigation", "Surface Soil and Sediment Investigation," "Human Health Risk Assessment" and the "Draft Feasibility Study."

Section 3: Technical Advisor Workplan

Part 1:

This section provides a detailed description of individual technical advisor tasks and their purposes. Technical assistance tasks described in this statement of work are based on feedback from members of the community during community involvement meetings and conversations with EPA Project Staff, Alachua County Department of Environmental Protection, State of Florida Department of Environmental Protection, Gainesville Regional Utilities, Gainesville City Commission, Alachua County Commission, their Staff and hired consultants.

For each of the tasks listed the Technical Advisor will prepare a summary report including a fact sheet and a presentation. All documents will be written for a non-technical audience, and will include visual aid wherever possible for explaining complex technologies or information. The summary report and fact sheet will be posted on the ProtectGainesville.org website, Protect Gainesville's Citizens Facebook site, and submitted to the Alachua County Library Cabot/Koppers Public Documents repository and EPA. Documents will also be printed for distribution to interested community members. The presentations will be presented at a community information meeting to be held prior to the period of public comment.

Historical Summary and Timeline

(Estimate: 100 hours.)

This site has been on the NPL list since September 24, 1984. Feedback from our Community Involvement Meetings and other conversations indicates a lack of understanding of the site history. A technical advisor will prepare a historical summary, highlighting the major issues of concerns, that addresses these misunderstandings and provides a clear and concise history of the site, remedial actions taken to date, and the timeline of various activities.

Tasks:

The Technical Advisor(s) will:

- Review all historical documents through the April 2006 Second Five Year Report.
- Provide the community with a concise summary of the issues, contaminants and previous remediation activities.
- Prepare a summary fact sheet.
- Prepare a historical timeline including activities of all responsible parties, EPA actions, impact studies, RODs, 5-year reviews, etc.
- Prepare a summary presentation for the Community Information Meeting.
- Submit all documents to Alachua County Public Documents Cabot/Koppers Document library.

Major Issues Summary and Fact Sheets

(Estimate: 210 hours.)

A technical advisor will address current major issues of concern: Groundwater Investigation, Soil/Sediment Investigation (including storm water runoff and fugitive dust), and Human Health Risk Assessment. These issues represent the core concerns of our members. For each issue, a technical advisor will review current studies and related documents, prepare a summary and fact sheet, and deliver a presentation to the Community Information Meeting.

Tasks:

For each of the major issues the Technical Advisor(s) will:

- Review current studies and other significant documents.
- Prepare a summary report. Summaries should include a description of contaminants, description and evaluation of past remediation actions, current concerns & recommendations and any need for additional information.
- Prepare a summary fact sheet.
- Prepare a summary presentation for the Community Information Meeting.
- Submit all documents to Alachua County Public Documents Cabot/Koppers Document library.

Feasibility Study (FS)

(Estimate: 215 hours.)

Technical Advisor(s) will complete a detailed analysis of the proposed remedies in the draft feasibility study and then brief the community on its contents. Additionally, the advisor will prepare a written report to aid the community's preparation of public comments, specifically addressing the proposed cleanup measures. The advisor will make a presentation of his/her findings at a special community information forum held by Protect Gainesville's Citizens prior to EPA's public meetings. The advisor(s) will attend and participate in EPA's public meetings to be held in Gainesville during the public comment period.

The advisor(s) will be expected to analyze the health assessment thoroughly to ensure that public health is being adequately considered. The advisor(s) will prepare a summary report on the potential health risks posed by the site and how EPA proposes to address these risks. Additionally, this report will describe how major comments submitted by Protect Gainesville's Citizens and the general community were addressed by EPA in the responsiveness summary.

Remedial Design (RD)

(Estimate: 100 hours)

The technical advisor will be expected to carry out oversight functions during this stage. The advisor will review the final design to ensure that the design is consistent with the ROD. The advisor will be expected to report his/her findings in memorandum submitted to Protect Gainesville's Citizens Board of Directors. Excerpts about the progress at the site will be published on the ProtectGainesville.org website.

Remedial Action (RA)

(Estimate: 75 hours)

During the remedial action phase, the advisor will be expected to review the final inspection report. Within 30 days of the completion of the cleanup, the advisor will prepare a final report summarizing his/her findings. This report will be published on the ProtectGainesville.org website.

Part 2: Proposed Schedule of Technical Advisor Tasks and Costs

Schedule	Task	# Hours	Cost
Year 1: Prior to period of public comment, on current FS ¹	Historical Review and Summary <ul style="list-style-type: none"> • Review historical documents • Prepare Summary Report • Prepare Fact Sheet • Prepare presentation • Attend Community Information Meeting 	100	\$12,000
Year 1: Prior to period of public comment, on current FS ²	Major Issues Review <ul style="list-style-type: none"> • Review documents • Prepare Summary Reports • Prepare Fact Sheets • Prepare presentations • Attend Community Information Meetings 	210	\$25,200
Year 1: Prior to and during period of public comment, on current FS ³	Feasibility Study (FS) <ul style="list-style-type: none"> • Brief community on FS and attend FS meetings • Review comments on FS • Review ROD and prepare summary report 	215	\$25,800
Year 2	Remedial Design (RD) <ul style="list-style-type: none"> • Review pre-final and final design and prepare design evaluation report 	100	\$12,000
Year 2	Remedial Action (RA) <ul style="list-style-type: none"> • Review pre-final and final inspection reports and prepare cleanup evaluation report 	75	\$9,000
	Total Cost of Technical Advisor	700	\$84,000

1. See "Request for extension in the currently proposed Koppers Record of Decision Schedule" page 13

2. See "Request for extension in the currently proposed Koppers Record of Decision Schedule" page 13

3. See "Request for extension in the currently proposed Koppers Record of Decision Schedule" page 13

Section 4: Environmental Results Outputs and Outcomes

This grant to Protect Gainesville's Citizens will increase the number of citizen's aware of the EPA's action and the decisions that need to be made at the Cabot / Koppers Superfund Site. With increased local community awareness and input (through comments on technical documents and through public meetings), the final remedy and future uses of the site can be more reflective of local needs and concerns. In the long term, involving the local community in how the site is cleaned up and redeveloped will help ensure that land is put back into the most productive use possible, thereby furthering EPA's goal of cleaning up and reusing contaminated land (3.2.2 and 3.2). This, in turn, supports EPA's overarching goal of land preservation and restoration (Goal 3).

Timeline	Outputs	Measures	Outcomes
Within 30 days after grant award	Protect Gainesville's Citizens procures one or more qualified technical advisor(s) to assist the group in interpreting site-related documents.	Within 30 days of award TAG group issues procurement, solicits bids/proposals, selects best candidate, and enters into a contract with a technical advisor.	The community affected by the Cabot/Koppers site gain a better understanding of the technical issues at the site.
Monthly	Protect Gainesville's Citizens holds regular meetings which are open to the public.	Monthly. Expect an average of 15-20 active participants at monthly meetings.	Community learns about site cleanup procedures and decisions. Community gains a better understanding of technical issues at the site.
Prior to period of public comment, on current FS ⁴	Historical overview and timeline prepared by Technical Advisors.	<ul style="list-style-type: none"> • Summary report. • 1-2 page fact sheet.& Historical Timeline. • 15 minute presentation for community forum. 	Community learns about historical site cleanup procedures and decisions. Community gains a better understanding of technical issues at the site. Historical questions and activities will be better understood by the community.
Prior to period of public comment, on current FS ⁵	Technical Advisor reviews site-related document in relation to groundwater contamination. Provides analysis, reports and briefings for the group as directed.	<ul style="list-style-type: none"> • Summary Report • 1-2 page fact sheet • 15 minute presentation for community forum. 	Community learns about site cleanup procedures and decisions. Community gains a better understanding of technical issues at the site.

4. See "Request for extension in the currently proposed Koppers Record of Decision Schedule" page 13

Prior to period of public comment, on current FS ⁶	Technical Advisor reviews site-related document in relation to surface soil and sediment contamination. Provides analysis, reports and briefings for the group as directed.	<ul style="list-style-type: none"> • Summary Report • 1-2 page fact sheet • 15 minute presentation for community forum. 	Community learns about site cleanup procedures and decisions. Community gains a better understanding of technical issues at the site.
Prior to period of public comment, on current FS ⁷	Technical Advisor reviews site-related document in relation to human health risk assessment. Provides analysis, reports and briefings for the group as directed.	<ul style="list-style-type: none"> • Summary Report • 1-2 page fact sheet • 15 minute presentation for community forum. 	Community learns about site cleanup procedures and decisions. Community gains a better understanding of technical issues at the site.
During period of public comment, on current FS ⁸	Protect Gainesville's Citizens hosts a community information forum where technical advisor(s) present summary results of historical, groundwater, surface soil and human health risk assessment reviews.	Expect 200+ people for the community forum.	Community learns about site cleanup procedures and decisions. Community gains a better understanding of technical issues at the site.
Ongoing	Protect Gainesville's Citizens maintains an information website located at http://protectgainesville.org . Updated information released by the EPA, ACEPD, and technical advisors can be posted on this site.	Ongoing	Community learns about site cleanup procedures and decisions. Community gains a better understanding of technical issues at the site.
Ongoing	Protect Gainesville's Citizens maintains a facebook page and twitter account. These are synchronized to web page to automatically post announcements when new information is added.	Ongoing Currently 252 fans are actively following posts on this site.	Community is kept more actively informed about activities, new information and meetings.
During period of public comment, on current FS ⁹	Produce a series of short videos answering various questions about the Cabot/	Movies are produced and posted on website.	Community gains a better understanding of technical issues at the site.

5. See "Request for extension in the currently proposed Koppers Record of Decision Schedule" page 13

6. See "Request for extension in the currently proposed Koppers Record of Decision Schedule" page 13

7. See "Request for extension in the currently proposed Koppers Record of Decision Schedule" page 13

8. See "Request for extension in the currently proposed Koppers Record of Decision Schedule" page 13

Koppers Superfund site. Videos will be posted on website and possibly played in movie theatres and other venues.

Video will help us to reach a wider audience than might otherwise be reached with technical documents and fact sheets.

In response to site documents and work at the site. Expected to occur in years 1 & 2 of the TAG.

Technical Advisor reviews site related documents. Provides analyses, reports, and briefings for Protect Gainesville's Citizens meetings.

Deliverables submitted in time to allow community comments to be submitted within established site schedule.

Community gains a better understanding of technical issues at the site.

Community asks questions and provides EPA with feedback/comments on site work and site documents.

Community comments help in assessing, monitoring, and controlling unacceptable human exposures from site contamination; identifying a suitable reuse for the site; and identifying a final remedy based on the community's desired reuse.

9. See "Request for extension in the currently proposed Koppers Record of Decision Schedule" page 13

Section 5: Additional Requests

Application for Waiver of the \$50,000 TAG Funding Limit

This application is being made according to the section 35.4065 of 40 CFR Part 35. Our site characteristics indicate additional funds are necessary due to the nature or volume of site-related information. We have at least three of the ten criteria conditions listed.

- (1) A remedial Investigation / Feasibility Study ("RI/FS") costing more than \$2 million;
- (3) EPA reopens the Record of Decision;
- (4) The site public health assessment (or related activities) indicates the need for further health investigations and/or health promotion activities;
- (8) EPA expects a cleanup lasting more than eight years from the beginning of the RI/FS through construction completion
- (9) Significant public concern exists where large groups of people in the community require many meetings, copies, etc.. and

We understand that since we have not received a TAG grant in the past, we may only be awarded \$50,000 in the first phase with remaining funds to be awarded after we have demonstrated we have managed those funds effectively.

We are including this waiver application at this time because of the current short time frame available for Community Input. We feel it important to get our entire plan approved in advance so that we could seamlessly move from stage one to stage two of the plan.

Request for extension in the currently proposed Koppers Record of Decision Schedule

Our timeline requires at least 90 days from the grant award to the full Community Information session and the completed development of all informational materials. It is important that our community fully understand this information so that they can provide good constructive feedback during the Record of Decision process.

We ask that the Stake Holder meeting currently scheduled for March 30, 2010 be moved to a date that is at least 120 days after the grant award. The Public Comment Period and ROD Amendment final should also be moved back appropriately. This gives us 30 days to get information provided by technical advisors disseminated to the community for review so that they can give constructive feedback during the Stake Holder meeting and Public Comment Period.

Advance Payment

Protect Gainesville's Citizens, Inc. as a new recipient of a TAG is requesting an advance payment in the amount of \$2,000. We will use this payment to cover the costs of getting this project started, costs will include: establishing a bank account, establishing a phone line and voice mail service, advertising our RFP for a Technical Advisor(s), purchasing printing and office supplies.

