

**EPA HAZARDOUS BROWNFIELDS ASSESSMENT  
PROJECT WORK PLAN FOR THE  
TOWN OF HAMPTON., SOUTH CAROLINA**

**October 2007 - September 2010**

**EPA COOPERATIVE AGREEMENT # \_\_\_\_\_**

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Google Earth Aerial Image of SDS Site

## **1.0 INTRODUCTION**

### ***1.1 Project Description***

The Town of Hampton, county seat for Hampton County, is a rural community located in the southeastern area of South Carolina, with a population of 2,837. It is located within an hour's drive from the metropolitan areas Charleston, South Carolina and Savannah, Georgia, and is an hour's drive away from the resort community of Hilton Head, South Carolina. In the ten year period from 1990 to 2000, Hampton County experienced a decrease in population while the surrounding Lowcountry regions increased in population. It is located in the region of South Carolina known as the Lowcountry, a region known for its gentle climate and natural beauty. It became incorporated as a town in December 1879, on land donated, according to an early map, for "the town and courthouse of Hampton." Hampton is best known today for its southern hospitality, including the Hampton County Watermelon Festival, the oldest continuing festival in South Carolina.

In recent years, Hampton has recognized the need for revitalization of the community and has started work towards revitalizing the Historic Downtown District. Storefronts and homes are planned to be restored to their original charm and structure through a Historic Downtown Revitalization Project that began in early 2007. Hampton has recently employed a private landscape architectural firm, who has created the Hampton Conceptual Revitalization Master Plan which will aide the Town in its restoration efforts. As such, downtown streets are slated to see a facelift. However, this revitalization has not fully transitioned throughout Hampton's non-downtown neighborhoods, in part due to the blight and stigma of the SDS facility and other potential hazardous Brownfields sites.

The Former SDS Medical Waste Site (Med/Waste Inc. Incinerator Facility) is the target site for this grant. It is located at 100 Nix (Mill) Street in Hampton, Hampton County, South Carolina. The current owner of the site is Safety Disposal System. The former Med/Waste Inc. site was involved in the incineration and transfer of medical and other specialized waste from hospitals in North and South Carolina. Med/Waste Inc. was one of the largest medical waste management companies in the Southeast before closing operations and filing for bankruptcy. MediWaste Inc. was placed under an Administrative Order (AO) by the South Carolina Department of Health and Environmental Control (SCDHEC) in February 2002. Violations cited under the AO included problems with emissions monitoring equipment, improper storage of ash, and numerous containers and bags of

infectious waste stored haphazardly throughout the facility. The Town is unaware of the nature and extent of contamination at the property at this time. The Town plans to conduct a comprehensive assessment to identify all environmental concerns with grant funds from this project.

Meaningful redevelopment of abandoned and underutilized properties is essential to the economic growth of the Town. Specifically, the redevelopment of the SDS facility will ensure protection to human health and the environment at the specific property as well as neighboring properties. The property is adjacent to a residential neighborhood, and current site conditions of miscellaneous debris are an attractive but dangerous nuisance to area neighborhood children. Moreover, a church that is located across the street has recently received a \$750,000 grant to be disbursed over the next four years to form an after school program that will accommodate 160 children. These children will need to be protected from the potential environmental hazards currently located at the facility. Further, the church also has plans to expand its recreational ball fields on church property located across the street from the facility.

The property can be seen by anyone traveling into the Town on one of the main arteries, US Highway 60 I. The property cannot be marketed in any meaningful way in its current condition. Moreover, in its current condition, the property lends itself to potential illegal activity. It detracts from an otherwise low to middle income neighborhood that may be older but is for the most part clean and nuisance free. This blighted area affects the whole of Hampton County residents, because it is an obstacle to county development officials trying to market the County to new business interests.

In an effort to improve the situation, the Town received a \$750,000 Community Development Block Grant (CDBG) for demolition and removal of the existing structure and debris on the SDS facility. Demolition and removal activities are anticipated to be complete by the end of 2007 [and assessment efforts will begin shortly thereafter](#). The Brownfields project will allow the Town to take the next step on the path to redeveloping the site. The environmental assessment of the SDS facility will allow for an increased marketability of the property to prospective purchasers and developers. The result will be the removal of a significant blight from the community and its dampening economic impacts on surrounding properties. This development will in turn create employment, increase property values, and increase Town tax revenues. The infill development of this property in the Town will help reduce the use of existing greenspace, in addition to adding to the aesthetics of the community. Redevelopment would additionally remove the immediate health threat to community members by abating any environmental concerns and dangers from the facility

itself.

The community of Hampton is committed to making a difference and improving the overall environmental and citizen health of the Town. The focus of the community includes the creation of a thriving private sector; investment in infrastructure improvements to better businesses; and the provision of a well trained, educated, skilled work force. In keeping with the goal of empowering individuals and neighborhoods, the Town will partner with community organizations to prioritize assessment activities, envision redevelopment options and identify any additional Brownfields sites.

The current impact of the property on the community is one of disappointment. The former SDS facility occupies approximately ten acres, and stands as a symbol of the community's plight. The empty, forgotten and falling apart structure is a psychological factor in the decline of the community. Leaders from the adjacent neighborhood, such as the church, have taken a proactive approach to the development of the community with specific plans for expansion, including obtaining funds for a growing after school care program for children. However, this development is hindered by the presence of the SDS facility and the environmental stigma and hazards associated with it. The site-specific hazardous Brownfields assessment grant will allow the Town to investigate and uncover specifics regarding the past history of the SDS facility (via a Phase I ESA), as well as specific information on the nature and extent of environmental contamination and any hazards associated with such contamination (via a Phase II ESA).

The hazardous assessment grant is also intended in part to be used as a tool to educate local business owners and residents in Brownfields redevelopment, and provide them with the knowledge to redevelop properties that otherwise might be surpassed for available greenspace. Potential businesses have a difficult time seeing past the environmental uncertainty associated with Brownfields, such as the SDS facility, to choose to invest there. Thus, the SDS facility is a Brownfield that stands as a significant impediment to achieving success in economic redevelopment throughout the community. The Town will use the hazardous assessment grant as a tool to help the community remove those impediments.

### ***1.2 Project Performance and Accountability***

The Town intends to track and measure the successes of this grant by first identifying anticipated outcomes and outputs. The expected outputs associated with this grant include a Phase I ESA, an Endangered Species Survey, and a thorough Phase II ESA that fully assesses the environmental

conditions at the site. These expected outputs will be tracked and monitored. Additionally, as meaningful community participation is vital to the success of this grant, the Town will also track the number of public meetings/hearings held, the number of citizen attendees at these meetings, the number of community meetings Town officials attended and participated in, as well as keeping track of any public comments received throughout the process. In addition, all fact sheets and/or handouts will be kept for review. The inventory of additional Brownfields sites generated through this grant will be tracked for future use.

The identified expected outcomes of this grant include additional funds leveraged and the site cleared (via CDBG funds) and assessed and ready for redevelopment. To track the outcomes associated with this grant, the Town intends to track the amount of additional funds leveraged and, in the long term, the amount of jobs created at the site and the economic impact of redevelopment at the site. In addition, the Town expects to have a cleanup scheme in place following the development of the ABCA. Finally, the Town intends to work closely with EPA Region 4 staff to review quarterly reports, as well as technical documents, to ensure they following the terms and conditions of the grant.

### ***1.3 Organizational Structure and Responsibilities***

[The Clerk/Treasurer/Office Manager Lynn Sanders, under the direction of the Mayor and Town Council, will lead this project.](#) The Town of Hampton, South Carolina, is the sponsor of this application and is defined by EP A and 40 CFR Part 31 as a general-purpose unit of local government. The Town of Hampton is a Council-Mayor form of Government. The Mayor, Mayor Pro Tern, and three council members are elected at-large. The Mayor and Council make policy and enact laws, rules and regulations in order to provide for future community and economic growth. Additionally, the Council provides the necessary support for the orderly and efficient operation of Town services. [The Town and its consultant will solicit input from South Carolina Department of Health and Environmental Control \(SCDHEC\) as the project progresses, as it relates to site history, suggested assessment analyses, and redevelopment considerations.](#)

## **2.0 PROJECT TASK DESCRIPTIONS**

### **2.1 Task 1 - Project Management and Reporting**

The Town will perform the following project management tasks as required to implement and manage this project under the cooperative agreement, including all required reporting and contractor procurement.

#### **2.1.2 Project Management**

The Town will complete those activities necessary to manage the project in accordance with the work plan and all required statutes, circulars, terms & conditions, including [selection of an environmental consultant through a competitive bidding process](#), establishment and maintenance of necessary cooperative agreement records and files; financial management, project oversight, attendance at necessary project meetings, and attendance at EP A conferences and meetings.

The Town will prepare a Quality Assurance Management Plan (QAMP) during the first quarter. The QAMP will define the Town's and any subcontractors' quality assurance (QA) related objectives, policies, criteria, responsibilities, authorities, and will explain how those QA objectives will be attained for all activities which generate or evaluate data. A draft copy will be submitted to the EP A Project Manager for review and approval prior to commencement of any site work.

#### **2.1.2 Periodic Reporting**

The Town will complete and submit the following required periodic reports.

- Quarterly Progress Reports within 30 days of the end of each federal fiscal quarter
- MBE/WBE reports at least quarterly
- Financial status reports at least annually
- Property Profile Forms for each site when verified to be eligible and updated quarterly

#### **2.1.3 Contractor Procurement**

[Through a competitive bidding process](#), the Town will hire a consultant to assist with day-to-day

project activities, to assist with public involvement, conduct environmental assessments, conduct health monitoring activities, and cleanup/redevelopment planning. The Town plans to issue a Request for Qualifications and select a consultant prior to the planned project start date of October 1, 2007. [The contract will require that revisions to project documents required by EPA and the Town will be completed within the contract price.](#)

#### **2.1.4 Final Performance Report**

The Town will submit a final performance report to the EP A Project Officer within 90 calendar days after the expiration or termination of the award. The report will detail all activities conducted under the project and will include before and after photos of the assessment sites, if available. The report will include a discussion of the environmental, health, and economic benefits realized as a result of the project. In addition, the Final Performance Report will specifically address lessons learned by the project team in implementing the Brownfields assessment as well as successes achieved.

#### **2.2 Task 2 - Public Involvement**

The Town with the assistance of the selected consultant will develop a Public Involvement Plan to ensure that community concerns are considered in site identification, assessment planning, and execution. The Plan will also ensure that the public is kept informed of project progress and results and will encourage public involvement in the project. [A draft Public Involvement Plan will be submitted to EPA within the second fiscal quarter \(January through March 2008\)](#) with the final being submitted with the subsequent Quarterly Report.

The Town is committed to ensuring active and meaningful public participation. [The Town envisions assembling a team of stakeholders to include EPA's project coordinator, the Mayor, Town Clerk, local Health Department representatives, nearby residents, nearby property owners, local community groups, nearby business representatives, and SCDHEC representatives. The Town anticipates conducting public meetings and/or issuing a newsletter 2 to 3 times per year during the grant period](#) to inform community residents of the progress of the assessment at the SDS facility, as well as to request comments and suggestions from the local community. Project specific work will be presented at such meetings, and fact sheets will be distributed that clearly explain the progress of the environmental assessment. In addition, the Town will offer project specific presentations to existing community based organizations and community group meetings in an

effort to further disseminate the information. It is the Town's ultimate goal to address specific concerns from within the community and to address those concerns as a team.

The Town has taken the problems associated with the SDS facility, and the stigma associated with it, as a wake up call of sorts. As such, the Town intends to develop an inventory of additional Brownfields sites that may exist in Hampton. Community input is a key component to the development of this inventory, and the Town will look to the citizens to voice their concerns regarding properties in their communities. The Town will encourage public involvement by requesting input into a Brownfields inventory at public meetings.

The Town of Hampton and the selected consultant will continue to conduct a public involvement campaign to raise awareness, involve the local community in the decision making process, and identify sites and potential re-use options that would be of most benefit to the citizens of Hampton. The Town and the selected consultant will perform the following outreach efforts:

- Prepare a Public Involvement Plan.
- Present project updates at regularly-scheduled Town meetings with the Town Council that are open to the public.
- Publish community service announcements in the local media, such as *The Hampton County Guardian*, throughout the project to keep local residents informed of planned community meetings and project updates.
- Visit with community groups at their locations to gather input and develop ideas.
- Develop a project brochure that will highlight the project's goals and objectives, review the site-selection process, explain the events that will occur in the program, and provide contact names and information on how to get involved in the project.
- Develop a project website as an information repository where project updates and information can be posted.

## **2.3 *Task 3 - Site Inventory and Characterization***

### **2.3.1 Site Inventory**

The Town of Hampton and the selected consultant(s) will gather information on additional Brownfield sites in the targeted area by working closely with the Town Council and other community groups that are working toward neighborhood revitalization. This inventory, once

created, will identify and prioritize investment opportunities for the blighted neighborhoods. This inventory, in turn, will be a resource used to identify high priority Brownfield sites. In addition, the Town will partner with the community groups to identify additional sites within local neighborhoods that are negatively impacting their redevelopment.

Once a comprehensive list is developed, sites will be prioritized for future assessment activities based on the criteria noted below. [These criteria will be shared with the community as part of outreach efforts.](#)

- a. Level of perceived contamination and threat to human health and the environment;
- b. Proximity of the sites to residents;
- c. Level of community support for redevelopment of the site;
- d. Level to which the redevelopment is complicated by known or suspected contamination;
- e. Level to which redevelopment of the property will eliminate blight at the site and to the surrounding areas;
- f. Lack of viable or liable parties to conduct cleanup activities (site eligibility according to EPA and state guidelines);
- g. Willingness of current property owner to sell and participate in the negotiation of a mutually beneficial transaction with potential end-users;
- h. [Ability to obtain an access agreements from the property owners to allow assessments to proceed](#)
- i. Site inventory activities will focus on sites where the past use of hazardous substances or petroleum products is likely to have taken place.

### **2.3.2 Site Characterization - Phase I Assessment**

Phase I ESA activities will be performed by the selected consultant(s) for the SDS site. All Phase I ESA's will follow procedures specified in the American Society for Testing & Materials (ASTM) Standard Practice for Environmental Site Assessment (E 1527) and the EPA approved All Appropriate Inquiry Rule. The primary goal for this activity is to make an "appropriate inquiry into previous ownership and use of the property consistent with good commercial or customary practice." There are four primary components to the Phase I ESA: Records Review, Site Reconnaissance, Interviews, and Report Preparation. The final report will include a statement as to evidence of recognized environmental conditions. Where concerns are identified, recommendations for Phase II ESA activity may be included in the report. A property profile form will also be

submitted to EPA with the final Phase I ESA report for each property.

### **2.3.3 Endangered Species Act and National Historic Preservation Act**

Although, not generally performed as part of an ASTM Phase I ESA, the Town will require the selected contractor(s) to perform an endangered species and habitat and cultural historic resources assessment in conjunction with the Phase I ESA. The selected contractor( s) will identify if any species or resources will be harmed or disturbed by the project or assessment activities and if so what assessment alternatives or mitigation could be done to eliminate or minimize the impact. The report will be submitted to EP A and SCDHEC under separate cover.

### **2.3.4 Site Characterization - Phase II Assessment**

Site-specific sampling and analyses will be performed as part of Phase II ESA in an effort to characterize the occurrence, distribution, nature and extent of contamination in soil and groundwater at the property. A site assessment report will be prepared and submitted to EPA summarizing results of Phase II ESA activity. An updated property profile form will be included with the final Phase II ESA report.

### **2.3.5 Quality Assurance & Health and Safety Plans**

Prior to conducting field activities, a site specific Quality Assurance Project Plan (QAPP) and Health and Safety Plan (HSP) will be prepared with input from SCDHEC, for the SDS site prior to Phase II ESA activity and submitted to EPA [for review and approval](#).

## **2.4 Task 4 - Health Monitoring**

After the assessments are complete and contamination has been confirmed on the site and possibly off-site, the Town will conduct a health impact analysis to identify any possible health effects related to the pollutants. These assessments will serve to identify threats to human health and the environment.

[If a health impact is determined to have occurred from the contamination, the Town will work with and set aside grant funds for local Health Department officials to conduct health monitoring.](#) Monitoring will include general population surveys on health effects and monitoring at local

clinics for indigent care. Health statistics from the county and state health profiles will be used as a baseline for comparison. As the EPA is well aware, attribution of health effects to a particular site is very difficult to ascertain. Nevertheless, we will work with health agencies and community organizations to determine whether any reduction occurs; and, if so, whether it can be attributed to cleanup of Brownfield sites.

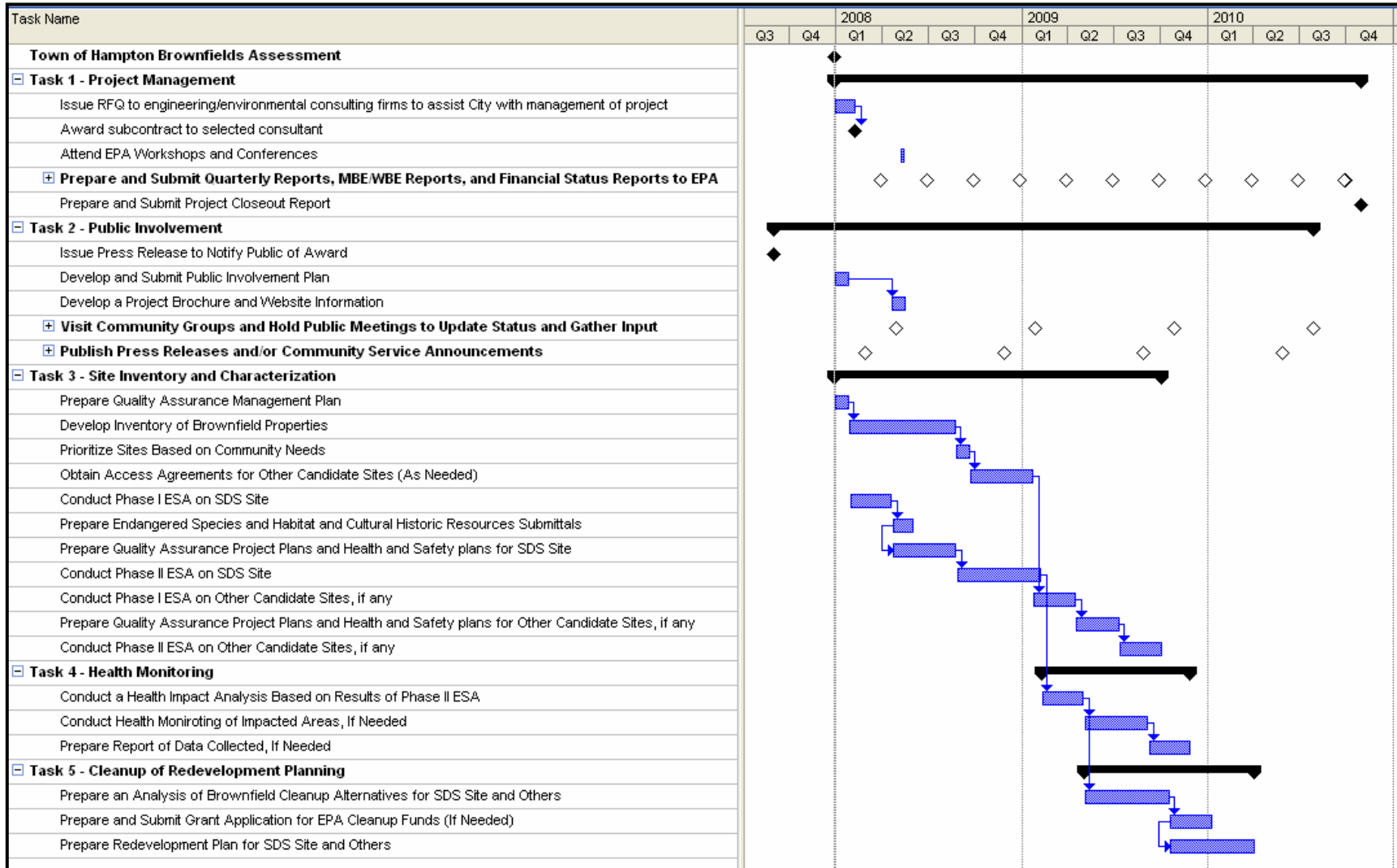
In such an instance where health monitoring is judged to be warranted, the Town, with the assistance of the selected consultant and the local Health Department, will prepare a health monitoring plan documenting the proposed methods for the health monitoring activities. The plan will be submitted to the EPA for review and approval. At the conclusion of the health monitoring, a final report, documenting all methods, results, and recommendations for the health monitoring activities, will be submitted to the EPA.

## **2.5 Task 5 - Cleanup and Redevelopment Planning**

The Town and the selected consultant(s) will prepare an Analysis of Brownfields Cleanup Alternatives (ABCA) for the site. The ABCA will summarize information about the site and contamination based upon the Phase I and II ESA's; cleanup standards; applicable laws; alternatives considered; and the proposed cleanup plan. The ABCA will identify potentially applicable remediation alternatives and provide estimates of the nature, extent, duration, and cost of implementing select remediation alternative at the sites. This task will provide potential buyers with a general description of potential remediation alternatives and approximate cost to assist in redevelopment planning. Consultant(s) will be encouraged to use risk-based corrective action and innovative site assessment and remediation techniques during the site assessment and cleanup planning tasks.

### 3.0 SCHEDULE & DELIVERABLES

An estimated project schedule detailing activities and deliverables is provided below.



The deliverables to be produced as part of this grant are noted elsewhere in this work plan and reiterated below.

- Quarterly progress reports
- Quarterly MBE/WBE reports
- Property Profile Forms, updated as required
- QA Management Plan
- Public Involvement Plan
- Site Inventory
- Endangered Species and Historic Preservation submittals
- Health & Safety Plan(s)
- Phase I ESA Report(s)
- QA Project Plan(s)
- Phase II Assessment Report(s)
- Health Monitoring Report, if needed
- Analysis of Brownfield Cleanup Alternatives
- Final Performance Report

**4.0 BUDGET**

**4.1 Budget Table**

Table 1 below contains an estimated project budget detailed by subtask and budget category.

<b>Budget Categories</b>	<b>Task 1 – Project Management</b>	<b>Task 2 – Public Involvement</b>	<b>Task 3 – Site Inventory &amp; Characterization</b>	<b>Task 4 – Health Monitoring (if necessary)</b>	<b>Task 5 – Cleanup and Redevelopment Planning</b>	<b>Total</b>
Personnel						\$0
Fringe						\$0
Travel		\$10,000				\$10,000
Equipment						\$0
Supplies		\$5,000				\$5,000
Contractual		\$30,000	\$125,000	\$10,000	\$20,000	\$185,000
Other						\$0
<b>Total</b>	<b>\$0</b>	<b>\$45,000</b>	<b>\$125,000</b>	<b>\$10,000</b>	<b>\$20,000</b>	<b>\$200,000</b>

#### 4.2 **Budget Narrative**

The Town intends to fund most programmatic expenses associated with Town personnel managing and participating in the Brownfields Assessment project with in-kind funds from the Town's budget. Therefore, the Town estimates to request the EP A to provide funds for three budget categories - Travel, Supplies, and Contractual.

**Travel:** The Town estimates that three personnel will attend the Region IV new Grantees workshop in Charleston, South Carolina in July; two personnel will attend the 2008 and 2009 National Brownfields Conferences; and personnel will attend regional conferences and workshops as approved by the EP A. Total travel expenses are estimated to be approximately \$10,000. Note: Pre-award travel costs to attend the Region IV new grantees workshop in Charleston, SC on July 25 - 26 will be approximately \$1,500.

**Supplies:** The Town anticipates funding will be required to conduct outreach activities and produce outreach materials and supplies for the execution of the grant. Total supplies expenses are estimated to be approximately \$5,000.

**Contractual:** The Town plans to hire one or more consultants to assist with the day-to-day project activities, to assist with public involvement, conduct environmental assessments, conduct health monitoring activities if needed ([with assistance from the local Health Department](#)), and perform cleanup/redevelopment planning. Total contractual expenses are estimated to be approximately \$185,000.