

SOUTHERN CAROLINA REGIONAL DEVELOPMENT ALLIANCE

Meaningful public participation and involvement are key elements to the overall brownfields process. It ensures that community concerns are considered during cleanup planning and execution and also informs the public of the project's progress and results. In order to accomplish this goal, the Southern Carolina Regional Development Alliance has prepared this Public Involvement Plan.



FORMER SHAW INDUSTRIES PROPERTY BROWNFIELD CLEANUP PROJECT

Public Involvement Plan
December 2011

Southern Carolina Regional Development Alliance Brownfield Cleanup Project

PUBLIC INVOLVEMENT PLAN

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INTRODUCTION

The Southern Carolina Regional Development Alliance (SCRDA) received a \$200,000 Brownfields Cleanup Grant from the Environmental Protection Agency (EPA) in September 2011 for the cleanup of hazardous substances at the former Shaw Industries site in Fairfax, South Carolina. As a part of the grant conditions, SCRDA will contribute a twenty percent (20%) match of \$40,000. Brownfields properties, according to the EPA definition, are “real property, the expansion, redevelopment, or reuse of which may be complicated by the presence or potential presence of a hazardous substance, pollutant, or contaminant.” Contamination by hazardous substances is inhibiting the redevelopment/reuse of the former Shaw Industries site.

The 27 acre single parcel property, Former Shaw Industries, was undeveloped and used for agricultural purposes prior to the 1960’s when a commercial structure was constructed. Various carpet manufacturers owned or operated the plant from 1963 until 2001, including Sylvania Spinning Mill, Queen Carpet, BASF, Connors & Akman, Kenlon Mills, and Shaw Industries. The available information suggests the plant was only used for yarn spinning operations; however, the Phase II Environmental Site Assessment (ESA) confirmed that hazardous substances were used in the manufacturing processes at the facility. Currently, the facility is unoccupied. The Phase II ESA, dated July 14, 2010, found soil contamination and confirmed groundwater contamination. Chlorinated solvents and metals were the most commonly found contaminants. Funds from the cleanup grant will be used to return the site to a productive use that protects the health of the citizens, protects the environment, and provides jobs to this severely economically depressed community.

Public involvement has been integral to SCRDA’s work with the former Shaw Industries site. SCRDA first discussed its intent to apply for this EPA Brownfields Cleanup Grant at an Executive Committee meeting of its Board on September 28, 2010. Further, a written advertisement was placed in *The Allendale Sun* on Thursday, September 30, 2010. This public notice announced that the SCRDA was applying for an EPA Brownfields Cleanup Grant for the Former Shaw Industries Property, that a public meeting would be held on October 12, 2010, at 7 pm at the James B. Brandt Building, and that the draft grant was available for comment after October 5, 2010, at the Allendale County Administrative Offices.

Meaningful public participation is vital to the cleanup process to ensure that community concerns are considered during the cleanup and disposal activities as well as redevelopment planning. The SCRDA recognizes the importance of an involved public that is knowledgeable of the brownfields and cleanup processes and supportive of the project’s efforts. The reasons include the following: to engage in dialogue so that community citizens have a voice in site cleanup and redevelopment options and plans; and to ensure that the public is provided with all findings of the environmental work performed. The SCRDA is pleased to present this public participation plan that outlines specific methods of achieving this goal.

BACKGROUND

History

The previously undeveloped land was utilized in 1964 as a commercial site with the construction of one main building. This structure has since been occupied by various carpet manufacturing businesses including Queen Carpet, BASF, Connors and Akman, Kenlon Mills, and Shaw Industries. Shaw Industries was sold to Berkshire Hathaway, Inc., on January 4, 2001. The Shaw Industries facility in Allendale County closed later that year. With the exception a few leases for using the building for warehousing, the Former Shaw Industries Property has been vacant since 2001, not providing jobs or a tax base to the community.

Experience and foresight led SCRDA to acquire the Property, because it knew that an absentee owner is less able to market the property and less concerned about its impact to the community. SCRDA, a non-profit organization established to bring industry to a very impoverished area of South Carolina, knew that it could better market the Property since it is a local entity. Shaw Industries donated the property to the SCDRA on December 10, 2009. Prior to receiving the donation, SCRDA entered into a Voluntary Cleanup Contract (VCC) as a non-responsible party with the South Carolina Department of Health and Environmental Control (DHEC). This contract (VCC 09-511-NRP) became effective on December 7, 2009. VCC 09-5511-NRP includes a scope of work for the assessment and cleanup of the property. The VCC requires the SCDRA to take reasonable measures to limit or prevent exposure to existing contamination on the Property.

The assessment work required by the VCC was performed by Fuss & O'Neill, Inc (F&O) on July 14, 2010 and is described in the document "Former Shaw Industries Phase II ESA". DHEC personnel have reviewed the Phase II ESA and require certain actions to be accomplished at the Property including cleaning, characterizing contents for disposal, and disposing or recycling of the four ASTs on the property which may include the characterization, removal and disposal of fluids and sludge, characterizing contents of the drums for disposal, disposing or recycling of the drums, and removing, characterizing for disposal, and disposing of contents of floor drains or closing the floor drain system. Further, the SCRDA will remove, characterize for disposal, and dispose of the contaminated concrete area around a former air compressor, and the SCRDA will remove or close the septic tank system. The area known as the south ditch contained chemicals of concern (COCs) and chemical odors. This area will be cleaned up so that there is no potential for human contact with the COCs. The soil around the Fibrolube ASTs contained various chemicals of concern that will be removed. Any waste, impacted soil, or other media removed will be characterized for disposal and disposed properly. The SCRDA's goal with respect to cleanup is to comply with the VCC so that the property is suitable for at least an industrial use and to obtain a certificate of completion from DHEC.

After cleaning up the environmental contamination, the SCRDA will rehabilitate/remodel the current building prior to marketing the property for sale/lease.

County Characteristics

Allendale County is comprised of a majority of African American residents. The residents of Allendale County are much more likely to be poorly educated, disabled, unemployed, and living in poverty than other South Carolinians or citizens of the United States. Poorly educated, disabled, unemployed African Americans living in poverty are a sensitive population. They lack the resources to fight undesirable conditions, the education to question environmental contamination and its potential effects, and the ability to challenge the establishment. This area is clearly an environmental justice community.

ENGAGING THE COMMUNITY

Partnerships

SCRDA has strong partnerships with Allendale County, the University of South Carolina Salkehatchie Leadership Institute, and Allendale Alive. All of these organizations are working together to improve the health and well being of the citizens of Allendale County.

The Project Team is comprised of Mr. Bill Robinson, SCRDA, Brownfields Project Manager, Brian Gross, EPA Project Manager, Angela Gorman, DHEC Project Manager, Blake Burgess and Jeremy Grant, environmental consultants, F&O, and Gail Rawls Jeter, environmental consultant, PBC. The Project Team generally holds a bi-monthly conference call, and meets as needed.

To involve the community and maintain its support, the SCRDA has established a Brownfields Task Force to provide a means for the community and community based organizations to serve a formal role in the project. The Task Force will meet quarterly, some meetings may be by conference call, during the three year grant period, totaling a minimum of twelve (12) meetings unless the grant ends and is closed out earlier. The Task Force includes Tim Bennett, Allendale County Administrator; Wilbur Cave, Director of Allendale Alive; Bennie Everett, Allendale County School Administrator; Becky Freeman, Finance Director of Town of Fairfax; Lottie Lewis, Councilwoman, Town of Allendale; Ann Rice, Executive Director, University of South Carolina – Salkehatchie Leadership Center; Tommie Sanders, President of Allendale County NAACP, environmental consultants, F&O and CTC Public Benefit Corporation (PBC); Brian Gross, EPA project manager; and Angela Gorman, DHEC project manager. The Task Force held a kick-off meeting on October 4, 2011, to discuss the grant implementation process. EPA representatives, Brian Gross and Philip Vorsatz, attended.

The Task Force will assist with community outreach and be involved in the cleanup planning necessary to accomplish its goal of attracting a business that will offer jobs and an increased tax base to the community. The Task Force will serve as the voice of the community and as a conduit to community. They will be able to address the concerns neighborhood residents have as they see equipment and personnel working at the Former Shaw Industries Property.

In addition to holding regularly scheduled quarterly Task Force meetings, the SCRDA will also hold periodic public meetings and issue press releases to relay information on the progress of the cleanup activities. SCRDA will provide an opportunity for interested residents to review and comment on the

ABCA and draft cleanup plan. Information sheets will be prepared and distributed before and after cleanup of the site. SCRDA intends to use the following methods of communication to disseminate information and report the progress of the brownfields project: Brownfields Task Force members; public meetings; project brochure and updates on its website; newspaper articles in local newspapers; and public notices.

Other Languages

Census data for Allendale County indicated that English is spoken by all residents, so community outreach is planned in English. It is not anticipated that a translator will be needed at any community meetings, but SCRDA is committed to fostering meaningful public participation. If a translator is required for any non-English speaking citizen, SCRDA will accommodate that need.

SPECIFIC PUBLIC INVOLVEMENT ACTIVITIES

Task One: Community Outreach

Community Outreach activities will be performed to ensure that the cleanup progress is relayed to all who are interested and that public input is solicited. Jobs are integral to improving the conditions in Allendale County, so the SCRDA anticipates significant community interest in the ongoing activities. For all community outreach activities, the SCRDA will continue to work closely with the community-based organizations that are most affected by and are interested in the project. Outreach details include the following:

- **Spokesperson:** The SCDRA has designated Bill Robinson, SCDRA's Director of Economic Development for Allendale County, as its spokesperson.
- **Website:** A project specific website will be developed and maintained to inform the community and stakeholders on the project activities. This website will provide real time, up-to-date information on news, meeting announcements and summaries, and project accomplishments. Pertinent documents will be available through the web site. It will be linked to the SCRDA's website.
- **Brochure/Information Sheet:** In order to engage the community and encourage public participation in SCRA's brownfields effort, a brownfields informational brochure will be developed and made available at SCRA's office, and a brochure will be placed in the Information Repository. The brochure will also be distributed at community meetings. The purpose of the brochure is to enhance awareness of the overall brownfields project. The brochure will provide a brief background on brownfields, outline the activities to be accomplished as part of this initiative, and give the contact information for the project team. Also, a brownfields informational brochure will be developed and distributed to the community at the beginning of the project; one will be developed and distributed to the community after the cleanup is complete and at other times if needed.

- **Stakeholders:** A Brownfields Task Force has been developed. Those included in the Task Force are listed above (Engaging the Community – Partnerships) The task force members are responsible for distributing information to all interested parties and providing notification of upcoming meetings, as well as other opportunities for public involvement. The Brownfields Task Force Meetings will be held approximately on a quarterly basis. Task Force meetings will include sign-in sheets to track attendance. E-mail addresses will be requested so information can be provided electronically.
- **Information Repository:** The SCDRA will establish an Information Repository (IR) at a location convenient to the site. The IR is expected to be established at the Allendale Hampton Jasper Regional Library at 158 McNair Street, Allendale, South Carolina. The IR will contain all pertinent documents related to the cleanup and will be updated on an on-going basis.
- **Press Releases:** To increase public awareness of SCRDA’s Brownfields Cleanup Project, information will be provided to the local news media as needed during the project. The SCRDA will provide an opportunity for interested residents to review and comment on the Analysis of Brownfields Cleanup Alternatives (ABCA) by providing a thirty (30) day public notice in *The Allendale Sun*. The local media to which the press releases may be issued include *The Allendale Sun*, *The Hampton County Guardian*, and *The People- Sentinel*. The information will be submitted to local radio stations such as WDOG 95.3 FM and WDOG 1460 AM if determined appropriate. Also, all applicable information will be posted on SCDRA’s website and the project website.
- **Public Participation and Community Meetings:** SCDRA recognizes that well-informed citizens who understand the project’s goals are more likely to support it than those who are ill-informed or who may have only learned bits and pieces of the technical jargon out of context. Regularly scheduled Task Force meetings will be open to the community to relay information on the progress of the cleanup activities. Also, the project team will disseminate information through members of the Brownfields Task Force and community members. Those who attend and participate in community meetings will be encouraged to speak to others about the Brownfields activities and persuade them to get involved. As the need arises and/or at the request of stakeholders on behalf of civic groups, the project team will go to the group requesting information and provide formal presentations about the Brownfields Program, deliver updates, and distribute written materials.

Task Two: Cleanup Planning

The SCDRA and its consultants, F&O and PBC, will prepare an ABCA for the property that will summarize information about the property and contamination based upon the environmental site

assessments previously completed; the VCC requirements; cleanup standards; applicable laws; alternatives considered; and the proposed cleanup plan. The primary goal is to identify applicable remediation alternatives and to estimate the nature, extent, duration, and cost of implementing the remedial alternatives. The ABCA will be submitted to DHEC and the EPA for review and approval. The draft ABCA will be placed on public notice for a minimum of 30 days. This public notice will be placed in *The Allendale Sun* and will be available for review at the Allendale Hampton Jasper Regional Library and SCRDA’s office. The SCRDA will address and incorporate the comments. Then, a Final Cleanup Plan will be developed and included in the Information Repository.

Task Three: Site Cleanup

The specific scope of cleanup activities will be included in the Final Cleanup Plan developed based on the ABCA. As stated above, the Final Cleanup Plan will be included in the Information Repository. It is anticipated that confirmation sampling will be needed during cleanup activities; thus, a Quality Assurance Project Plan (QAPP) and an environmental Health and Safety Plan (HSP) will be prepared and submitted to DHEC and the EPA prior to such sampling. These documents will be included in the Information Repository also. A community meeting will be held prior to initiating site cleanup in order to inform the community of anticipated actions on the site and what they will see happening on the site. This meeting is an opportunity for the community to ask questions about what will occur in the cleanup process. A community meeting will be held following the cleanup work to report on the accomplishments.

Measures:

The Town has identified measures of success for the project to help ensure that the objectives are achieved. Successful public involvement may be measured utilizing the table that follows:

Task	Output Measurement	Outcome Measurement
Public Involvement	<ul style="list-style-type: none"> • No. of Project Team and Brownfields Task Force meetings • Quantity of outreach materials distributed • No. of community meetings for project team • No. of public announcements printed/aired 	<ul style="list-style-type: none"> • No. of attendees at meetings • No. of public inquiries received • No. of attendees at meetings • Circulation
Cleanup Planning	<ul style="list-style-type: none"> • ABCA 	<ul style="list-style-type: none"> • No. of Public Comments Received

Schedule:

The following is an anticipated schedule for completing the above tasks. It should be noted that several of the tasks (i.e. community meetings) will be completed on an “as needed” basis.

Establish Project Team	-	October 4, 2011
Establish Brownfields Task Force	-	October 4, 2011
Kick-off Community Meeting	-	October 4, 2011
Project Team Meetings/Conference Calls	-	Bimonthly
Brownfields Task Force Meetings Open to Community	-	Approximately Quarterly
Public Involvement Plan	-	December 30, 2011
Develop Project Brochure	-	February 28, 2012
Launch Project Website	-	March 31, 2012
Establish Information Repository	-	Within 30 days of ABCA completion
Publish Public Notices	-	As needed
Meet with Community Groups	-	Community is invited to Brownfields Task Force Meetings