

Joe McDonald, Mayor

Judi Bowden Smith
City Clerk/Treasurer

Andy Rutens, Attorney



Council Members

Chris Andrews
Newton Cromer
Kevin Dean
Natalie Moyer
Chris Jessee

R04-26-C-001

APPLICATION INFORMATION SHEET

1. **Applicant Identification:** City of Saraland, Alabama
727 Saraland Boulevard South
Saraland, AL 36571

2. **Website URL:** <https://saraland.org/>

3. **Funding Requested:**
 - a. Grant Type: Single Site Cleanup
 - b. Federal Funds Requested: \$2,612,561

4. **Location:**
 - a. City: Saraland
 - b. County: Mobile County
 - c. State: Alabama

5. **Property Information:**
The Land: Saraland Sports & Recreation Complex
7365 Celeste Road
Saraland, AL 36571

6. **Contacts:**
 - a. Project Director:
Ashley-Nicole Flowers
Director of Parks & Recreation
(251) 675-5103
jaflowers@saraland.org
727 Saraland Boulevard South
Saraland, AL 36571

 - b. Chief Executive/Highest Ranking Elected Official:
Joe McDonald
(251) 599-8870
jmcdonald@saraland.org
943 Saraland Boulevard
Saraland, AL 36571

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7. Population:

Saraland, Alabama - 16,075 (US Census Bureau, American Community Survey. 2018-22)

8. Other Factors:

<u>Other Factors</u>		<u>Page #</u>
Community population is 15,000 or less.	X	P.4
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.		
The proposed site(s) is impacted by mine-scarred land.	X	P.1
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the remediation/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation.	X	P.2-3
The proposed site is adjacent to a body of water (i.e., the border of the proposed site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	X	P.2
The proposed site(s) is in a federally designated flood plain.		
The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	X	P.2
The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures.	X	P.2
The proposed project will improve local resilience to the impacts of extreme weather events and natural disasters.	X	P.2
The target area(s) is by a coal-fired power plant has recently closed (2015 or later) or is closing.	X	P.1

9. Releasing copies of Application – Not applicable. No confidential, privileged or sensitive information is presented in the grant application.

NARRATIVE

2026 EPA Brownfields Cleanup Grant Application

The Land: Saraland Sports & Recreational Complex, Saraland, Alabama

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

Target Area and Brownfields

a. Overview of Brownfields Challenges and Description of Target Area: The **target area for this Cleanup Grant is the entire City of Saraland, Alabama**, a small but fast-growing municipality in east-central Mobile County within the Mobile Metropolitan Statistical Area. Saraland's development has been shaped by proximity to the City and Port of Mobile, located approximately 8 miles to the south. While recent growth has been driven by residential demand, strong schools, and planned commercial investment, historic industrial and construction-related activities left environmental conditions that continue to constrain safe reuse of land within the City.

Saraland was largely rural until mid-20th-century industrial expansion in the Mobile region drove rapid growth northward. As manufacturing and port-related activity increased, Saraland experienced accelerated development, including **surface mining of sand and clay for construction materials** and placement of fill from unknown sources, activities that predated modern environmental controls. The City also developed in proximity to heavy industrial uses along the Mobile River and U.S. Highway 43 corridors, including the nearby Barry coal-fired Steam Plant, whose **recently closed coal-fired units and associated ash ponds** contributed to a legacy of environmental contamination and negative community perception. As housing expanded along corridors such as Celeste Road, residential neighborhoods were built around former mine-scarred land that remained environmentally uncertain and unattractive for private redevelopment. These legacy conditions embedded brownfields within otherwise stable neighborhoods, creating long-term barriers to reuse.

The impacts of these brownfields are magnified in a small city with limited land inventory and public amenities. Saraland has a **population of 16,075**, limited recreational land (**0.8% of total land area**), and lower access to exercise opportunities than the state and nation. The City also has a higher share of **seniors (21.4%)** and elevated rates of **diabetes (14.9%) and heart disease (7.2%)**, increasing the importance of safe, accessible recreational infrastructure. With **30% of residents classified as low-income**, the City lacks the financial capacity to independently address complex contamination issues that delay redevelopment.

In response, Saraland selected a centrally located, former mine-scarred property for redevelopment as **The Land: Saraland Sports & Recreation Complex (Sportsplex)**, reflecting a strategic shift toward sports tourism and recreation, an emerging economic sector in nearby Gulf Coast communities. The site had no competing private market interest but offered the opportunity to convert underutilized land into a community-serving asset. During construction, hazardous substances associated with historic fill material were discovered, confirming the site as a brownfield and halting progress due to regulatory and financial constraints beyond the City's capacity.

This EPA Cleanup Grant directly addresses Saraland's brownfield challenges by enabling remediation of contamination resulting from historic industrial practices. Cleanup will remove exposure pathways, reduce regulatory uncertainty, and allow safe completion of a citywide recreational facility. By resolving contamination at this site, the grant supports public health, restores land affected by past misuse, and enables Saraland to advance a new tourism-based economic sector while strengthening long-term community resilience.

b. Description of the Proposed Brownfield Site(s): The proposed brownfield site is the Sportsplex, located at 7365 Celeste Road, adjacent and contiguous to Bayou Sara to the west. The City acquired the approximately 100-acre property in March 2007 and is currently developing it into a multi-use sports and recreational complex designed to serve residents across Saraland and the greater Gulf Coast region. Planned site improvements include eight baseball/softball fields, multi-use athletic fields, tennis courts, basketball courts, pickleball courts, volleyball courts (indoor and beach), parking areas, internal roadways, a maintenance building, restroom and concession facilities, totaling more than 100 acres of integrated greenspace. Construction is funded through approximately **\$72 million in municipal bonds**, supported by tournament tourism and related economic activity.

Prior to City acquisition, Phase I Environmental Site Assessments (ESAs) identified historic surface mining of sand and clay materials during the 1960s and 1970s. Following cessation of mining operations, the site was filled with material from unknown sources, leaving behind **mine-scarred land**, that later became heavily vegetated. After years of planning, construction of the Sportsplex began in early 2024, involving significant grading and excavation work to prepare the ball fields. A, gray, non-native "Foreign Material" emitting odors was encountered in the northern portion of the site (referred to in this application as the "Northern Parcel Source Area"). Prior to the discovery of the contamination, limited quantities of this material were inadvertently moved to the southern portion of the Facility for fill where the initial baseball/softball fields were being constructed. Subsequent Phase II and extensive site characterization confirmed the presence of hazardous substances in the material, including polychlorinated biphenyls (PCBs—Aroclor 1248), pentachlorophenol (PCP), hexavalent chromium (Cr(VI)), and arsenic at concentrations exceeding EPA Regional Screening Levels (RSLs) for residential land use. The Foreign Material extends across approximately 7.5 acres of the northern parcel, with depths reaching up to 35 feet and an estimated volume of approximately 168,000 cubic yards (CY). Analytical data indicate that contamination is largely confined to the Foreign Material, with minimal vertical migration into native soils or groundwater.

Other areas of environmental concern include an adjoining detention pond containing PCB-impacted sediment, and remnants of buried drums containing a resin-like material. PCBs and volatile organic compounds (notably toluene) were detected in drum contents at concentrations exceeding screening levels. Subsequent investigations confirmed that this drum area is limited in extent and not the primary source of site-wide contamination, and groundwater has not been impacted. **The discovery of these hazardous substances has severely impacted construction activities¹**, and remediation of these materials is the primary focus of this cleanup plan.

¹ [Toxic chemicals found on site of Saraland's Sportsplex - Call News](#)

The City did not cause or contribute to contamination at the site and has proactively and voluntarily undertaken all assessment activities in coordination with EPA Region 4 and the Alabama Department of Environmental Management (ADEM) through the ADEM Voluntary Cleanup Program (VCP). Cleanup actions have already been successfully completed on the southern portion of the facility, leaving the Northern Parcel Source Area as the final and most significant phase requiring remediation. The proposed cleanup activities will eliminate exposure pathways, allow safe reuse of the entire site, and support full completion of the Sportsplex. The completed portions of the Facility are already generating measurable economic benefits through regional sports tourism, and remediation/full development of the Northern Parcel Source Area will further accelerate economic growth.

Revitalization of the Target Area

c. Reuse Strategy and Alignment with Revitalization Plans: Saraland’s reuse strategy for the proposed site is the completion and operation of a **regional, multi-use sports and recreation complex** that supports community health, youth development, tourism, and economic diversification. This reuse strategy affects the entire target area and is fully consistent with Saraland’s adopted Master Plan², developed through a community-driven planning process supported by the Alabama Department of Conservation and Natural Resources.

The Master Plan vision—“*Saraland is the Gateway to Progress*”—prioritizes proactive infrastructure investment, environmental stewardship, enhanced recreational opportunities, improved connectivity, and development of regional destination assets. The Sportsplex directly advances these priorities by: (1) expanding recreational amenities and greenspace in a rapidly growing residential corridor; (2) establishing a regional destination that attracts visitors and supports local and visitor-serving businesses; (3) strengthening community identity and civic pride; and (4) promoting responsible environmental stewardship through the cleanup and productive reuse of contaminated property. The site is not located within a federally designated floodplain, however, the reuse strategy incorporates stormwater management features, detention ponds, and greenspace designed to improve resilience to extreme rainfall events and to prevent impacts to **the contiguous Bayou Sara, which is in a floodplain**.

Public and stakeholder engagement has been integral in the development of the reuse strategy. The City has conducted public meetings, coordinated with the South Alabama Regional Planning Commission (SARPC), ADEM, EPA Region 4, and project design professionals; and provided regular updates to residents regarding contamination discovery, cleanup planning, and project phasing. Community input has consistently emphasized the importance of completing the Sportsplex as originally envisioned and ensuring that all areas are safe for public use.

d. Outcomes and Benefits of Reuse Strategy: Cleanup of the Northern Parcel Source Area will enable safe, productive reuse of the property as part of Saraland’s planned multi-use Sportsplex, directly supporting economic development, recreational access, and long-term community benefits the target area and nearby rural communities. The proposed cleanup and phased reuse strategy is expected to generate outcomes that are closely aligned with the City’s redevelopment vision and responsive to local community needs, as demonstrated below.

- **Economic and Community Benefits.** Completion of cleanup will allow the Northern Parcel to contribute to a regional recreational destination that supports sports tourism, attracts visitors, and strengthens local and visitor-serving businesses. The Sportsplex has already demonstrated its ability to generate economic activity and reinvestment within the target area, and remediation of the Northern Parcel will extend these benefits by removing a key barrier to full site utilization. The project will also preserve and expand publicly accessible recreational assets, providing long-term nonprofit and community-serving uses that enhance quality of life for residents.
- **Health, Recreation, and Quality of Life.** The reuse strategy emphasizes active recreation, open space, and community amenities that promote physical activity, youth engagement, and overall community well-being. Cleanup will eliminate or significantly reduce exposure pathways associated with contaminated soils, allowing the property to be safely used by families, youth, and visitors. These outcomes directly correlate with the planned reuse and support access to recreational opportunities in a rapidly growing area of the City.
- **Resilience and Environmental Stewardship.** The project will improve environmental conditions by stabilizing contaminated areas and restoring the site for beneficial reuse. The reuse strategy incorporates greenspace and stormwater management features that enhance resilience to extreme rainfall events from the hurricane/natural disaster-prone area, protecting surrounding environmental resources. The facility’s design includes the integration of solar technology, providing a renewable, energy-efficient source of power, and energy-efficient lighting. The City will continue to integrate energy-efficient practices and sustainable design elements consistent with the original design and the City’s adopted planning goals.

Strategy for Leveraging Resources:

e. Resources Needed for Site Characterization: The City has completed comprehensive site characterization to gain approval of cleanup plans for the Northern Parcel Source Area. Phase I and Phase II ESAs, supplemental investigations, and data evaluation documented in the draft Analysis of Brownfields Cleanup Alternatives (ABCA) were conducted in coordination with EPA Region 4 and ADEM, using funds for some portions of the work made available by SARPC’s brownfield assessment grant.

Based on this characterization, **full cleanup plans for the southern portion of the Facility have been reviewed and approved by both EPA Region 4 and ADEM**, and cleanup activities in that portion of the site have been successfully completed using leveraged City and SARPC brownfield assessment grant funds. **Public notices** for these approved cleanup plans were posted via **ADEM’s Voluntary Cleanup Program**, providing transparency and opportunity for public review and comment.

The investigations completed for the southern portion of the Facility, together with additional assessment of the Northern Parcel Source Area, demonstrate that **the entire site has been adequately assessed**. The ABCA documents

that contamination in the Northern Parcel Source Area is well-defined, largely confined to identified Foreign Material, and that groundwater impacts are not an issue. Based on discussions with EPA Region 4 and ADEM, **both agencies have indicated that similar cleanup plan approvals and associated institutional controls are anticipated for the Northern Parcel Source Area following completion of the proposed cleanup actions.**

As a result, **no additional pre-cleanup site characterization is required** to proceed with remediation of the Northern Parcel Source Area. The only additional sampling anticipated is confirmatory sampling following completion of cleanup activities, which will be conducted to document cleanup effectiveness, support regulatory closure, and support any required environmental covenants. **No further pre-cleanup assessment funding resources are needed to advance remediation of the Northern Parcel Source Area.**

f. Resources Needed for Site Remediation: The City anticipates that the **Cleanup Grant funding requested through this application will be sufficient to complete the proposed remedial tasks** described in *Section 3.a, Proposed Cleanup Plan*. Cleanup cost estimates have been refined based on completed site investigations, successful remediation of other portions of the Facility, resulting in a focused and cost-effective cleanup strategy for the Northern Parcel Source Area as demonstrated in the ABCA.

The City has already demonstrated a strong financial commitment to the project by funding extensive site characterization and completing cleanup of the southern portion of the Facility using City funds independent of this Cleanup Grant (totaling over \$3.5M). That work was completed under regulatory oversight and has reduced the scope and cost of the remaining cleanup activities addressed in this application.

In addition, SARPC has provided **\$61,000 in Brownfields Assessment Grant funding** to support cleanup planning and preparation of the Risk Assessment and ABCA and remains an active project partner. SARPC has committed to providing **financial assistance up to \$170,000**, to support eligible cleanup-related activities, as documented in the attached commitment letter. These leveraged resources further strengthen the City’s capacity to complete the cleanup efficiently.

Based on the cleanup scope, cost estimates, conceptual approval by EPA Region 4 and ADEM (substantiated by similar approvals for cleanup of the southern portion of the Facility) and leveraged local and regional resources, the City is confident that the requested EPA Cleanup Grant funding, combined with SARPC support and City-funded activities already completed, will be sufficient to complete remediation of the Northern Parcel Source Area. As an additional contingency, the City has access to the **ADEM Alabama Land Recycling Revolving Fund Program**, which offers low-interest loans to local governments for remediation of contaminated sites.

g. Resources Needed for Site Reuse: Redevelopment funding for construction of the Saraland Sportsplex has been substantially secured through the issuance of approximately \$72 million in municipal bonds. Bond proceeds are legally and contractually restricted to capital construction and reuse-related activities and cannot be used for environmental remediation, establishing a clear distinction between secured reuse funding and the need for EPA Cleanup Grant assistance.

Under the original approved development plan, the Northern Parcel was intended to include additional multi-sport athletic fields to expand tournament capacity and year-round recreational programming. During grading activities, contamination was discovered in this portion of the site, requiring suspension of construction and modification of project phasing. Construction is actively underway or completed in other areas of the Sportsplex using bond proceeds, and substantial reuse investments have already been made. The City has demonstrated its long-term commitment to the Sportsplex through significant capital investment and implementation of the project in phases. **Cleanup of the Northern Parcel Source Area represents the final remaining barrier to returning the entire Facility to productive use.** EPA Cleanup Grant funding will be used to remediate contaminated soils, place clean fill, perform grading and stabilization, and reseed the area to ensure the parcel is protective of human health and the environment and suitable for full development. Following cleanup, the City anticipates maintaining the Northern Parcel Source Area in safe, interim uses such as greenspace, parking, trails, or other compatible recreational features, consistent with the overall Sportsplex concept and the City’s adopted Master Plan. These interim uses will ensure the property remains actively managed and publicly beneficial while preserving flexibility for final construction of the originally designed multi-purpose fields once additional funding becomes available.

Saraland is a small, financially constrained municipality that has already invested substantial local resources in the Sportsplex based on anticipated sports tourism benefits. Unanticipated contamination discovered during construction exceeded the City’s capacity to address this issue independently, making EPA Cleanup Grant funding essential to complete remediation and protect public health. The following table summarizes the resources supporting assessment, cleanup, and reuse activities, and supporting documentation is included with this application.

Resource	Type of Resource	Secured/ Unsecured	Additional Details About the Resource
SARPC Brownfield Assessment Grant	(1.e,1.f) Assessment and cleanup planning	Secured	\$30,000 provided for initial cleanup planning, with an additional \$170,000 committed for risk assessment and Cleanup Plans
ADEM	(1.e,1.f) Remediation technical assistance	Partially-Secured	Technical assistance available upon City request, as described in the support letter.
City of Saraland	(1.g.0 Municipal Bonds	Secured	\$72M issued to fund Sportsplex construction.
ADEM’s RLF	(1.f) Remediation financing	Unsecured	Low interest loan available if requested by the City.

h. Use of Existing Infrastructure: The Sportsplex redevelopment leverages newly installed infrastructure, including roads, water, sewer, electricity, and broadband, all funded through existing bond proceeds. EPA Cleanup Grant funding

will enable use of this infrastructure by eliminating contamination that currently restricts access and functionality in the Northern Parcel Source Area.

(2) COMMUNITY NEED AND COMMUNITY ENGAGEMENT; Community Need a. The Community’s Need for Funding: The City of Saraland demonstrates a clear community need for EPA Cleanup Grant funding based on the extent to which its small population results in an **inability to draw on other sources of funding to carry out environmental remediation and subsequent reuse**, consistent with the FY26 evaluation criterion recognizing small population and/or low-income status as independent bases for need. **As clarified through EPA Brownfields Program outreach, communities with populations of 50,000 or fewer may be considered small, and with an estimated 2024 population of approximately 16,075 residents, Saraland qualifies as a small-population municipality whose fiscal capacity is constrained by population scale rather than income level.** This population size does not provide sufficient revenue density or capital access to independently finance brownfield cleanup activities.

Small Population Data	Saraland	Mobile County	AL	US
Small Population	16,075	412,339	5,157,699	340,110,988
Low Income	30%	43%	38%	30%
<i>Source: U.S. Census Bureau’s American Community Survey (ACS) 5-year estimates</i>				

While approximately 30% of Saraland residents are classified as low income, comparable to the national average and lower than county and state rates, the City’s inability to self-fund environmental remediation is driven by population scale and limited revenue density, not by elevated poverty levels. As a result of this small population scale, Saraland on the **municipal-level** has a limited ability to draw on local public funding sources to support cleanup and reuse without displacing essential municipal services. The City lacks revenue elasticity because its tax base is constrained by population scale and concentrated revenue sources, limiting the ability to generate additional general fund revenue or issue debt for large, non-recurring remediation expenses. Saraland lacks the additional bonding capacity and economies of scale necessary to absorb high-cost cleanup without displacing essential municipal services. It is important to distinguish between previously approved capital financing and the unplanned environmental remediation costs that give rise to this request. The City issued municipal bonds to support construction of the Sportsplex prior to the discovery of contamination, with bond proceeds legally and contractually restricted to planned capital development activities. The subsequent identification of contamination introduced substantial, unforeseen remediation requirements that could not be absorbed within the approved construction budget and were not eligible uses of existing bond funds. As a result, cleanup costs represent a separate and unanticipated financial obligation for which no local capital financing mechanism exists. Redirecting general fund resources toward cleanup would require deferral of public safety, infrastructure maintenance, or other core services, demonstrating that local government funding sources are structurally insufficient to meet remediation needs.

The **community-level** ability to self-fund cleanup is similarly constrained by population scale, rather than household income. With a limited population base, Saraland lacks the critical mass necessary for residents, neighborhood groups, or small businesses to collectively finance or coordinate environmental cleanup, which requires specialized technical work, regulatory oversight, and disposal activities. These costs exceed what can reasonably be borne through private or community-led efforts, even in a community that is not low-income, further limiting the availability of non-federal funding sources.

In addition, Saraland does not have access to a deep pool of private philanthropic institutions, large corporate actors, or redevelopment entities capable of assuming environmental cleanup liabilities on behalf of the community. Consequently, this contaminated property imposes ongoing risks, and the City lacks access to non-federal funding sources sufficient to support remediation and reuse. Without EPA Cleanup Grant funding, no alternative public, private, or community-based funding source exists to carry out remediation at this site, and the property would remain contaminated, inaccessible, and unable to be safely reused. EPA Cleanup Grant funding is therefore necessary to address this structural funding gap and to meet the demonstrated needs of this small-population community, enabling Saraland to carry out cleanup and advance safe, productive reuse that would not be feasible using other funding sources, consistent with the intent of the evaluation criterion.

2.b. Health or Welfare of Sensitive Populations: Sensitive populations in Saraland’s target area are clearly identified as (1) very young children and (2) a high share of older adults, along with (3) residents living with chronic cardiometabolic conditions who are more vulnerable to both environmental exposures and the downstream impacts of limited physical activity opportunities. Specifically, children ages 0–4 comprise 6.11% of Saraland’s population (vs. 5.8% Alabama and 5.7% U.S.), while adults age 65+ comprise 21.4% (vs. 17.0% Alabama and 16.8% U.S.), demonstrating a comparatively older community with age-sensitive needs. The severity of health/welfare concerns is further evidenced by elevated chronic disease prevalence: adult diabetes is 14.9% in Saraland (vs. 12.8% Alabama; 10.3% U.S.) and adult heart disease is 7.2% (vs. 6.0% Alabama; 5.3% U.S.), indicating a higher burden than state and national benchmarks. At the same time, **the built environment data show a structural access gap that worsens these welfare risks:** recreation/fitness facility access is 8.92 per 100,000 (vs. 12.31 U.S.), only 59% of residents have adequate access to exercise opportunities (vs. 61% Alabama; 84% U.S.), and recreational land is just 0.8% of total acres (vs. 3.0% Alabama; 25% U.S.). These disparities matter because major public health authorities identify insufficient physical activity as a modifiable risk factor linked to chronic diseases including heart disease and diabetes, meaning Saraland’s limited access to safe, nearby activity space is directly connected to the community’s documented health burden. Metrics for the community are included in the following table:

Health & Welfare	Saraland	Mobile County	AL	US
Children 4 and Under	6.11%	6%	5.8%	5.7%
Adults over 65	21.4%	16.9%	17%	16.8%
Recreation and Fitness Facility Access Rate per 100,000 ²	8.92	8.92	9.63	12.31
Percentage of Population with Access to Exercise Opportunities ³	59%	59%	61%	84%
Recreational Land Acres (Percentage of Total Land) ⁴	0.8%	0.8%	3%	25%
Chronic Conditions – Diabetes (Adults/ Age-Adjusted) ⁵	14.9%	14.1%	12.8%	10.3%
Chronic Conditions – Heart Disease (Adults/ Prevalence) ⁶	7.2%	6.1%	6%	5.3%
Depression - Adults (Prevalence) ⁷	23.7%	22%	24%	20.7%

Source: U.S. Census Bureau's American Community Survey (ACS) 5-year estimates

Although portions of the site were made available for recreational use through the use of engineering and institutional controls, the Northern Parcel Source Area is not usable due to the presence of contamination. During organized youth sports activities, it is possible that balls from the adjacent fields could enter this restricted contaminated area, including home run “trophy balls” that children seek to retrieve. It is also possible that non-athlete children attending games with their spectator-parents could wander into these contaminated areas. Such predictable behaviors have resulted in incidental entry into contaminated zones, demonstrating that institutional controls alone do not eliminate exposure pathways for children. Cleanup is therefore necessary to ensure that recreational use of the site is safe, continuous, and appropriate for sensitive populations.

The **proposed Cleanup Grant and reuse strategy directly address these issues and reduce related threats** by (1) eliminating exposure risks that currently prevent safe public use of Northern Parcel Source Area and (2) enabling the City to complete its construction of the entire Sportsplex, thereby full realizing community-scale access to physical activity for youth, seniors, and residents with chronic disease. Cleanup funding will reduce or eliminate future contaminant exposure in the Northern Parcel Source Area and enable completion of the planned reuse—a multi-use sports complex with eight baseball/softball fields, multiple courts (tennis, soccer, football, lacrosse), and ample greenspace. This investment will create a safe, local venue that materially improves access to physical activity and organized recreation, directly addressing Saraland’s comparative deficits in exercise access and a key modifiable risk pathway contributing to higher diabetes and heart disease. Transforming the contaminated area into a safe, walkable recreational space will reduce exposure risks for children, provide age-appropriate activity opportunities for older adults, and encourage regular physical activity that helps reduce diabetes and heart disease risk.

2.c. Greater Than Normal Incidence of Disease and Adverse Health Conditions: Populations in Saraland experience a greater-than-normal incidence of multiple adverse health conditions, including cancer, cardiovascular disease, respiratory disease, and adverse birth outcomes that may be associated with exposure to hazardous substances such as PCBs. Metrics are as follows:

Adverse Health Conditions	Saraland	Mobile County	AL	US
Cancer Mortality Rate ⁸	211.4	210	207.8	182.7
Colon Cancer Incidence Rate ⁹	46.4	45.8	41.1	36.5
Lung Cancer Incidence Rate ¹⁰	62.7	60.9	60.1	54.0
Asthma Prevalence ¹¹	10%	9.8%	10.1%	9.8%
COPD Prevalence ¹² (<i>Respiratory Condition</i>)	8.3%*	6.9%	7%	5.3%
Chronic Conditions – Heart Disease (Adults/ Prevalence) ¹³ (<i>Cardiovascular Condition</i>)	7.2%	6.1%	6%	5.3%
Low Birth Weight ¹⁴	12.1%	12.2%	10.5%	8.3%
Birth Defects Deaths Rate Per 100,000	Not Available	270	157.3	112

Cancer outcomes in Saraland exceed county, state and national benchmarks: overall cancer mortality is 211.4 per 100,000, higher than Alabama (207.8) and the United States (182.7); colon cancer incidence is 46.4 per 100,000, exceeding Alabama (41.1) and the U.S. (36.5); and lung cancer incidence is 62.7 per 100,000, higher than Alabama (60.1) and the U.S. (54.0). These findings are significant because multiple animal studies have provided conclusive evidence that PCB exposure can cause cancer, with documented associations between PCBs and colorectal and lung cancers, the same cancer types already observed at elevated rates among Saraland residents. Cardiovascular and

² US Census Bureau, County Business Patterns. Additional data analysis by CARES. 2023

³ ArcGIS Business Analyst and Living Atlas of the World, YMCA & US Census Tigerline Files. Accessed via County Health Rankings. 2024

⁴ United States Geological Survey (USGS) Protected Areas Database. 2023.

⁵ Centers for Disease Control and Prevention, [Behavioral Risk Factor Surveillance System](#). Accessed via the [PLACES Data Portal](#). 2023

⁶ Centers for Disease Control and Prevention, [Behavioral Risk Factor Surveillance System](#). Accessed via the [PLACES Data Portal](#). 2023

⁷ Centers for Disease Control and Prevention, [Behavioral Risk Factor Surveillance System](#). Accessed via the [PLACES Data Portal](#). 2023

⁸ Centers for Disease Control and Prevention, CDC - National Vital Statistics System. Accessed via CDC WONDER. 2019-2023

⁹ State Cancer Profiles. 2016-20. Rate per 100,000.

¹⁰ State Cancer Profiles. 2016-20. Rate per 100,000.

¹¹ [PLACES: Local Data for Better Health](#)

¹² [PLACES: Local Data for Better Health](#)

¹³ Centers for Disease Control and Prevention, [Behavioral Risk Factor Surveillance System](#). Accessed via the [PLACES Data Portal](#). 2023

¹⁴ University of Wisconsin Population Health Institute, County Health Rankings. 2016-2022

respiratory conditions further demonstrate a heightened disease burden in Saraland. Heart disease prevalence in Saraland is 7.2%, exceeding both the Alabama rate (6.0%) and the national rate (5.3%), representing a more than 16% higher burden than the U.S. average. Chlorinated organic pollutants such as PCBs have been linked in scientific literature to the development or exacerbation of cardiovascular disease, making this elevated prevalence directly relevant to potential contaminant exposure pathways.

Saraland also exhibits elevated respiratory vulnerability, with **Chronic Obstructive Pulmonary Disease (COPD)** prevalence of 8.3%, higher than Alabama (7.0%) and the United States (5.3%). Saraland demonstrates a greater-than-normal prevalence of **asthma** compared to national benchmarks, indicating elevated respiratory vulnerability within the community, particularly among children and other sensitive populations. Scientific studies¹⁵ have identified correlations between prenatal and postnatal exposure to PCBs and the later development of asthma, making respiratory outcomes especially relevant when evaluating and reducing potential exposure-related health threats through cleanup actions at the site. City-level birth-defect mortality rates are not available for Saraland; however, regional and statewide data indicate elevated vulnerability relevant to the target area. **Birth-defect-related deaths** occur at a rate of 270 per 100,000 in Mobile County, compared to 157.3 per 100,000 statewide and 112 per 100,000 nationally, demonstrating a substantially higher regional burden of adverse birth outcomes. Scientific literature¹⁶ indicates that chlorinated organic pollutants such as PCBs can cross the placental barrier and have been associated with developmental toxicity and adverse birth outcomes in animal studies, supporting the relevance of birth-related health conditions when evaluating potential exposure-related threats and the need for cleanup actions in Saraland. While city-level birth-defect mortality data are unavailable, Saraland's significantly elevated **low-birth-weight rate** provides direct evidence of adverse birth outcomes in the target area.

The **Cleanup Grant and reuse strategy will directly address documented health threats** by eliminating exposure pathways associated with PCB-contaminated materials and other hazardous substances that currently prevent safe reuse of the Northern Parcel Source Area. Cleanup activities will reduce current and future exposure risks linked to cancer, cardiovascular disease, respiratory illness, and adverse birth outcomes, while enabling reuse that returns the property to safe, productive, and publicly accessible use. Converting the site into the originally planned multi-use recreational facility will expand access to routine physical activity and promote health-protective behaviors that improve community health. Accordingly, this strategy responds to Saraland's greater-than-normal disease burden and satisfies EPA evaluation criteria by reducing exposure-related threats and ensuring reuse is safe for affected populations.

d. Economically Impoverished/Disproportionately Impacted Populations: Certain populations in the City of Saraland disproportionately experience negative environmental consequences from contaminated and underutilized land associated with past industrial and commercial activities, regardless of overall community income levels. Contaminated properties have created localized environmental burdens, including restricted land use, elevated exposure risk, and limited access to safe recreational and community spaces, with the greatest impacts on children, older adults, and residents with existing health conditions who are more vulnerable to environmental stressors. These burdens are disproportionately borne by residents living in close proximity to contaminated and underutilized properties and are not shared equally across the broader Saraland population.

Saraland exhibits documented health vulnerabilities, including elevated rates of cancer, cardiovascular disease, respiratory illness, and adverse birth outcomes, indicating that certain populations experience compounded exposure and health risks relative to state and national benchmarks. When contaminated sites remain unremediated, these communities must contend with both ongoing exposure hazards and the absence of health-protective infrastructure, further exacerbating existing disparities. In this context, environmental burdens are not evenly distributed but instead disproportionately affect sensitive populations and nearby residents, regardless of overall community income levels. These disproportionately impacted populations also have limited ability to avoid or mitigate exposure through private means, including relocation or access to alternative recreational resources, reinforcing the need for publicly funded cleanup to address environmental burdens they cannot otherwise escape.

This Cleanup Grant and reuse strategy will directly address these disproportionate impacts by eliminating exposure pathways associated with hazardous substances and fully returning the contaminated Northern Parcel Source Area to safe, productive use. Cleanup activities will reduce environmental risks borne by nearby populations, while completion of the planned reuse as a multi-use recreational and community facility will expand access to safe outdoor space, physical activity, and community resources that are currently limited. In addition, full development of the Sportsplex will solidify a tourism and event-based revenue stream that supports local small businesses, diversifies the local economy, and enhances municipal revenue flexibility. By transforming a source of environmental burden into a community asset, the project will reduce disproportionate environmental impacts, improve health-protective infrastructure, and enhance quality of life for populations that have historically borne the negative consequences of contamination.

Community Engagement: e. Project Involvement; and f. Project Roles: The cleanup efforts necessary to support the ongoing construction of the Saraland Sportsplex have been formulated with significant input from community

¹⁵ [Prenatal exposure to polychlorinated biphenyls and asthma, eczema/hay fever, and frequent ear infections - PubMed](#)

¹⁵ Ma J, Kouznetsova M, Lessner L, Carpenter D O. 2007. Asthma and infectious respiratory disease in children – correlation to residence near hazardous waste sites. *Paediatr Respir Rev.* 8(4):292-8.

¹⁶ [EWG || Human Toxome Project; Environmental Factors in Birth Defects: What We Need to Know - PMC; Perspective on prenatal polychlorinated biphenyl exposure and the development of the progeny nervous system \(Review\) - PMC](#)

stakeholders. The following diverse group of organizations and partners are committed to fostering community involvement and environmental stewardship.

Name	Mission	Point of Contact	Specific Involvement
Keep Saraland Beautiful	Community-based organization promoting environmental stewardship, litter prevention, and beautification.	Ron Mitchell [REDACTED]	Supports cleanup-related outreach, litter control, And beautification activities around the Sportsplex.
Saraland Chamber of Commerce	Represents local businesses and supports econ. growth and stakeholder communication.	Shilo Miller shilo@sralandchamber.com	Provides business community input on cleanup progress and economic impacts.
Alabama Brownfields Assn.	Provides statewide brownfields expertise, training, and information-sharing.	Cheyenne Kilpatrick, admin@albfa.org	Advises on brownfields best practices and coordination with statewide partners.
Economic Development Partnership of AL	Supports regional economic development and project coordination statewide.	Greg Barker, gbarker@edpa.org	Provides input on economic development considerations related to cleanup and reuse.
Mobile Bay National Estuary Program	Promotes protection and restoration of water quality and coastal resources.	Roberta Swann; rswann@mobilebaynep.com	Advises on stormwater management, environmental protection, and site resilience.
AL Environmental Council	Statewide organization advocating for environmental stewardship and public health.	ALenvcouncil@gmail.com	Advisory role providing perspective on environmental and community health priorities.
Community Members and Facility Users	Residents and users of the Sportsplex and surrounding community.	Various	Provide input on cleanup priorities and reuse through meetings and feedback channels.

g. Incorporating Community Input: The City of Saraland has implemented an ongoing, multi-channel approach to communicate project progress and meaningfully incorporate community input throughout discovery of contamination, cleanup planning, construction, and future reuse. A public meeting specific to this EPA Cleanup Grant application was held on January 22, 2026, providing residents and stakeholders an opportunity to learn about site conditions, the proposed cleanup approach, and anticipated reuse, and to ask questions and provide feedback.

Since discovery of environmental impacts, the Mayor has consistently communicated with the public through recorded video updates, which have been shared via the City’s website and social media platforms. These updates provide accessible, timely information on contamination findings, cleanup planning, coordination with regulatory agencies, and project milestones, serving as an effective alternative to in-person engagement.

Additional communication methods include public meetings, coordination with local organizations, direct outreach, and online updates. Community input is solicited through public forums, written comments, and informal feedback channels and is reviewed by City staff to inform cleanup decision-making, reuse planning, and project phasing. This approach ensures transparency, responsiveness, and continued community involvement throughout implementation of the cleanup project. All community feedback will be considered and responded to ensure all voices are heard.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a. Proposed Cleanup Plan: The City proposes implementing a comprehensive, risk-based cleanup of the Northern Parcel Source Area as the final phase of remediation necessary to allow full redevelopment and safe public use of the entire Sportsplex facility. The cleanup plan is based on extensive site characterization, completed remediation activities in other portions of the site, and the ABCA prepared in accordance with EPA Cleanup Grant requirements.

The Northern Parcel Source Area includes the primary historical disposal area where foreign industrial materials were originally dumped, as well as the adjacent detention pond area that has received sediment runoff from the dump site and a discrete drum disposal area where remnants of buried drums containing hazardous substances were discovered. These areas collectively contain the highest concentrations and largest volume of contamination identified at the Facility and represent the remaining barrier to full buildout of the Sportsplex.

Investigations conducted by the City’s Environmental Professional (EP) identified PCBs, PCP, Cr(VI), and arsenic, with concentrations exceeding EPA Residential RSLs, within non-native Foreign Material placed at the site during more than 40 years ago. The original dump site for the Foreign Material extends across approximately 7.5 acres of the Northern Parcel Source Area, with a maximum measured thickness of approximately 35 feet. Based on site assessment data, the estimated volume of Foreign Material in this area is approximately 168,000 CY. Impacts are largely confined to this material, with minimal vertical migration and no evidence of widespread groundwater contamination.

Cleanup of the site will be conducted under dual regulatory oversight. EPA will provide oversight for PCB-related activities in accordance with the Toxic Substances Control Act (TSCA), while ADEM will oversee cleanup of PCP, Cr(VI), and other non-PCB contaminants under the VCP. The entire Sportsplex property is already enrolled in the VCP, providing an established regulatory framework and liability protection for the City as a non-responsible party.

Importantly, the City has already demonstrated its ability to successfully implement approved cleanup actions at this site. Remediation of the Baseball/Softball Fields Area (southern portion of the facility) was completed under the VCP with full regulatory approval from both EPA and ADEM. That work included excavation, consolidation, placement of clean fill, and implementation of institutional controls, and has allowed construction of those facilities to safely proceed.

Impacted materials excavated from the baseball and softball fields were returned to the Northern Parcel Source Area, where the material was originally disposed, further consolidating contamination into a single area for final remediation.

Conceptual remedial strategies for the Northern Parcel Source Area have been discussed with both EPA and ADEM, and both agencies have conceptually approved the proposed risk-based approach, pending completion of final risk assessment and cleanup planning documents. For non-PCB contaminants, a site-specific risk assessment will be completed in accordance with ADEM’s Alabama Risk-Based Corrective Action (ARBCA) guidance. The ARBCA process has already been successfully applied to the Baseball/Softball Fields Area, where results demonstrated that risks could be effectively managed through engineering and institutional controls. Similar outcomes are anticipated for the Northern Parcel Source Area based on comparable site conditions and contaminant behavior.

For PCBs, the City will seek approval from EPA Region 4 to implement a risk-based cleanup approach under 40 CFR §761.61(c). This approach allows for protection of human health and the environment while avoiding unnecessary excavation and off-site disposal of large volumes of material that would otherwise make redevelopment unfeasible. The selected cleanup alternative focuses on eliminating exposure pathways, consolidating impacted materials, and preparing the entire northern parcel for remaining planned development. The specific cleanup tasks to be implemented with EPA Cleanup Grant funding are summarized below.

Drum Area:

- Excavate and remove remnants of buried drums and associated impacted soils from the drum disposal area.
- The drum area cleanup is estimated to involve approximately **2,000 CY of material**, equivalent to approximately **2,600 tons**, requiring off-site disposal at a permitted hazardous waste landfill.
- Confirmatory sampling will be conducted as required to document removal of impacted material.

Detention Pond Area:

- Excavate sediment and Foreign Material from the detention pond area that has received runoff from the Northern Parcel Source Area.
- Transport excavated sediment and Foreign Material to the original dump site of the Northern Parcel Source Area for consolidation, estimated to involve approximately **17,000 CY** of sediment and Foreign Material.
- Dewatering will be conducted as necessary. Based on existing data, treatment of pond water is not anticipated.

Original Dump Site of the Northern Parcel Source Area:

- Consolidate impacted materials, including excavated sediment from the detention pond area, within the dump site of the Northern Parcel Source Area.
- Complete a site-specific risk assessment in accordance with ADEM’s ARBCA guidance to establish risk-based cleanup levels for non-PCB contaminants. Similar outcomes obtained from the previously approved Baseball/Softball Fields Area cleanup actions are anticipated.
- Obtain EPA approval to implement a risk-based cleanup approach for PCBs under 40 CFR §761.61(c).
- Place a protective exposure barrier consisting of a minimum **2-foot-thick layer of clean, tested fill material** across the entire area of the Northern Parcel Source Area where impacts exist.
- The entire Northern Parcel Source Area encompasses approximately **13 acres**, and placement of the exposure barrier is estimated to require approximately **41,900 CY of clean fill material**, inclusive of grading needs and fill placement within the detention pond area.
- Grade, stabilize, and vegetate the surface to prevent erosion, manage stormwater, and prepare the site for remaining planned recreational and open-space development.

Institutional and Engineering Controls:

- Maintain existing and proposed institutional controls/covenants, including restrictions on groundwater use, as required under the VCP.
- Implement long-term soil management and operations and maintenance requirements, as applicable, to ensure continued protection of human health and the environment.

Description of Tasks/Activities and Outputs:

(b) Project Implementation, (c) Anticipated Project Schedule (d), Task Activity/Lead, and (e) Outputs: The table below provides a detailed listing of the major tasks to be completed for the proposed cleanup project, including associated activities, anticipated schedule, responsible party, and expected outputs. All activities have been reviewed to ensure they are allowable uses of EPA Brownfields Cleanup Grant funds. The EP has already been selected and is under contract with the City.

b. Implementation/ Tasks	Activities/Subtasks	Details		
		c. Project Schedule	d. Task Activity/Lead	e. Outputs
TASK 1 Project Management/ Reporting	Accept Cooperative Agreement and submit grant work plan	30 days after award	Applicant	Executed Cooperative Agreement, grant mgmt. oversight, EPA kickoff meeting, 16 quarterly reports in ACRES database, 4
	Grant Management	Continuous	Applicant	
	Coordinate with EPA and ADEM throughout project implementation	30 days after award	Applicant & EP	
	Prepare and submit required EPA progress reports and ACRES updates	Quarterly	Applicant & EP	

	Travel to Brownfield Conference	Year 1	Applicant	annual DBE reports, closeout documents
	Kickoff Mtg with EPA and BAC	60 days after award	Applicant	
	Final Closeout	30 days after grant closeout	Applicant & EP	
TASK 2 Community Involvement	Prepare Community Involvement Plan	60 days after award	Applicant and EP	1 CIP; 3 meetings/minutes
	Community Mtgs.	Quarters (Q) 1, 4, and 8	Applicant and EP	
TASK 3 Cleanup Planning	Complete site-specific risk assessment in accordance with ADEM ARBCA guidance	Q1	EP	1 QAPP; 1 Final ABCA; 2 cleanup plans; 2 meetings with ADEM and EPA with minutes; 1 bid specification document, selected subcontractor contract documents.
	Prepare/submit risk-based PCB cleanup plan to EPA	Q2	EP	
	Prepare/submit PCP/Cr(VI) and arsenic cleanup plan to ADEM	Q2	EP	
	Prepare and submit QAPP	Q1	EP	
	Finalize ABCA and Cleanup Plans	Q2	EP	
	Prepare plans/specs/bid documents for Remediation Subcontractors	Q2	EP	
	Remediation Subcontractor Selection	Q3	Applicant	
	Pre-cleanup planning with Remediation Subcontractor	Q3	Applicant and EP	
	Pay ADEM VCP Fees for Report Review	Q2	Applicant	
TASK 4 Cleanup Activities	Dewater detention pond and transport sediments to source pile	Q4	EP & subcontractor	Removal hazardous wastes (drum area) offsite; detention pond cleanup; stabilization and capping of foreign material; 1 final VCP Cleanup Report, ADEM letter of concurrence.
	Drum Excavation/ Transport / Disposal	Q4	EP & subcontractor	
	Fill, grade and stabilize source pile and entire 13-acre parcel	Q4	EP & subcontractor	
	Cleanup Report Preparation	Q8	EP	
	Institutional controls/Covenant, VCP Letter of Concurrence	Q9	EP	
	Pay VCP Fees for Final Reports/Covenants/LOC	Q10	Applicant	

f. Cost Estimates: The anticipated cost for each of the tasks described above is provided in the Budget Table below. Details on how each cost was derived are provided in the table footnotes.

Cost Budget Categories		Project Tasks and Estimated Costs				Total (rounded)
		Project Management / Administrative	Community Involvement	Cleanup Planning	Cleanup Activities	
Direct Costs	Personnel					
	Travel	\$2,950 ¹				\$2,950
	Equipment					
	Supplies					
	Contractual	\$24,500 ²	\$7,000 ³	\$80,745 ⁴		\$112,245
	Construction				\$2,441,862 ⁵	\$2,441,862
	Other ⁶	\$55,515 ⁶				\$55,515
Total Direct Costs		\$82,965	\$7,000	\$80,745	\$2,441,862	\$2,612,572
Indirect Costs						
Total Federal Funding (not to exceed \$4,000,000)		\$82,965	\$7,000	\$80,745	\$2,441,862	\$2,612,572
Total Budget (Total Direct + Indirect Costs)		\$82,965	\$7,000	\$80,745	\$2,441,862	\$2,612,572

Federal Funding Details

¹ City Grant Manager and Mayor travel expenses for attendance at one BF conference: \$2,950 (no labor, travel expenses only)

² EP to assist with project mgmt./reporting: \$175/hr x 140 hrs. = \$24,500.

³ EP to assist with Community Involvement Plan and meeting(s) attendance: (\$175/hr x 40 hrs. = \$7,000).

⁴ EP to assist with Cleanup Planning, to include: Risk Assessment (\$195/hr x 76 hrs=\$14,820); QAPP (\$175/hr x 36 hrs=\$6,300); Remedial Design/PCB Cleanup Plan for EPA (\$195/hr x 75 hrs=\$14,625); Non-PCB Cleanup Plan for ADEM VCP (\$175/hr x 90 hrs=\$15,750); Plans/Specs/Bid Documents for remedial construction contractor selection(\$195/hr x 105 hrs=\$20,475); Cleanup Report (\$195/hr x 45 hrs = \$8,775). **Total EP Planning=\$80,745.**

⁵Cleanup Activities/Construction (Remedial Contractor, EP oversight, and Confirmation Sampling). Remedial Contractor costs est. at \$2,356,962 and includes: Detention Pond Cleanup (17,000 CY x \$9 CY = \$153,000; Drum Area Cleanup (2,600 tons x \$240/ton = \$624,000); Placement of fill material over 13-acre Source Area (41,947 CY x \$30/ CY = \$1,258,410); Site Grading (est. at \$100,000); Seeding (est. at \$15,470), and 15% fill construction contingency (\$206,082). EP Construction oversight costs est. at \$84,900 and includes EP construction oversight (\$150/hr x 320 hrs = \$48,000); EP Confirmation Sampling (labor at \$135/hr x 40 hrs = \$5,400) + Lab Costs (\$325/sample x 60 samples = \$19,500) + Misc. unknowns (est. at \$12,000). **Total Cleanup/Construction Costs: \$2,441,862.**

⁶ "Other" costs include: Conference fees for two (\$350 x2=\$700); ADEM VCP review fees, to include: Cleanup Plan review (\$13,270) + Risk Assessment Review (\$4,350) + Cleanup Report Review (\$8,570) + Letter of Concurrence (\$4,210) + Environmental Covenant registry fee for Institutional and Engineering Controls (\$24,415). **"Other" costs total: \$55,515.**

g. Plan to Measure and Evaluate Environmental Progress: The City will track, measure, and evaluate environmental progress using established project management practices, schedule and budget tracking tools (including spreadsheets and Gantt charts), regulatory milestones, and EPA reporting systems to ensure accountability and transparency throughout the cleanup process. Progress will be monitored through completion of defined tasks and milestones outlined in the approved workplan to ensure activities advance on realistic timelines within the four-year period of performance, including execution of remedial activities, regulatory approvals, and site restoration. The Grant Manager will track contractor performance, expenditures, schedules, and deliverables to ensure costs align with completed tasks and that activities are completed on time and in accordance with EPA and ADEM requirements. Anticipated, measurable outputs include: (1) completion and approval of required cleanup plans and regulatory documents; (2) removal and proper management of a measurable quantity of contaminated soil, as determined during implementation; (3) placement of clean fill and grading of the site to restore stable conditions suitable for reuse; (4) completion of confirmatory sampling and documentation demonstrating attainment of cleanup goals; and (5) submission of required quarterly and final reports, with outputs recorded in ACRES.

Expected **outcomes** include: (1) reduction or elimination of exposure pathways associated with contaminated media; (2) return of the Northern Parcel Source Area to a condition protective of human health and the environment; and (3) preparation of the site for safe, productive reuse consistent with the City's phased redevelopment strategy. These outcomes align closely with EPA's strategic plan objectives and will support the long-term health, safety, and prosperity of the Saraland community. Project performance and results will be reported to EPA through quarterly performance reports and ACRES entries, ensuring progress toward outputs and outcomes is accurately documented and evaluated.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

Programmatic Capability a. Organizational Structure, and b. Description of Key Staff: Saraland has an established organizational and financial management structure to ensure timely, compliant implementation of EPA cooperative agreements. The Parks and Recreation Department will serve as the lead department for this Cleanup Grant, with responsibility for overall project coordination, technical oversight, and compliance with cooperative agreement requirements. The primary Grant Manager will be **Ashley-Nicole Flowers**, Director of the Parks & Recreation Department. Ms. Flowers will oversee day-to-day grant administration; coordinate with EPA, ADEM, the EP, and remediation contractors; monitor project schedules and deliverables; and ensure timely reporting and documentation. Her role provides direct integration between cleanup activities and the City's long-term redevelopment objectives. Financial management, procurement compliance, and grant accounting will be provided by the **City Clerk's Office, led by Casey Etheridge**, which maintains established internal controls and federal grant reporting systems. Administrative support from the City Clerk's Office will ensure compliance with applicable federal financial management and reporting requirements. Executive oversight is provided by the Mayor's Office and City Attorney to support interdepartmental coordination and ensure alignment with City priorities.

c. Acquiring Additional Resources: The City uses established procurement and contracting systems to acquire additional expertise and resources necessary to complete the cleanup project. Professional services and construction-related services are obtained through competitive procurement processes in accordance with the City's adopted procurement policies and applicable federal, state, and local requirements, including 2 CFR Part 200. When additional expertise is needed, the City issues requests for qualifications or proposals, evaluates submissions based on technical competence, relevant experience, and cost reasonableness, and executes contracts that clearly define scopes of work, deliverables, schedules, and compliance requirements. Contracted entities are managed through regular coordination, review of invoices and deliverables, and adherence to approved budgets and timelines.

The City does not anticipate using subrecipients for this project. All non-City services will be provided through procurement of contractors in accordance with applicable requirements, ensuring clear accountability and compliance with EPA cooperative agreement conditions. Architectural and civil engineering firms are already under contract for construction of the Sportsplex and will coordinate with the Parks & Recreation Department and the EP to integrate cleanup requirements into final site grading, stormwater management, and redevelopment plans. This coordinated approach ensures that cleanup and redevelopment activities are efficiently sequenced and mutually supportive.

Past Performance and Accomplishments

e. Has Not Received an EPA Brownfield Grant but has Received Other Federal or Non-Federal Assistance Agreements: Saraland has managed several federal grants successfully in the past and has the full capability to manage this EPA Brownfield Cleanup Grant and perform all phases of work under the grant.

1. Purpose and Accomplishments: Three examples of our recent experience in managing federal grants and programs and accomplishments are indicated below:

Program	Awarded	Amount	Purpose and Accomplishments
CDBG	2012	\$375,000	Funded construction of the Saraland Recreation Center and was successfully closed out in 2016.
CDBG	2018	\$100,000	Funded construction of an additional building at the Cleveland House for Saraland's special needs residents and was successfully closed out in 2021.
ARPA	2021	\$3,478,876	Funds were used to purchase land for the Land Sports & Recreation Complex and to equip Public Safety/Fire Rescue to meet community medical needs during COVID-19.

2. Compliance with Grant Requirements: Each of the grants discussed above were completed in compliance with work plans, schedules, budgets, terms, and conditions as required by each grantor.

THRESHOLD CRITERIA

**CLEANUP GRANT THRESHOLD CRITERIA
NORTHERN PARCEL SOURCE AREA OF
THE LAND: SARALAND SPORTS & RECREATION COMPLEX
CITY OF SARALAND, ALABAMA**

1. Applicant Eligibility:

a) Applicant Type: The City of Saraland, Alabama, is a unit of local government as defined in 2 CFR § 200.1, and therefore, is an eligible entity to receive an EPA Brownfields Cleanup grant.

b) Federal Tax Status: The City of Saraland is not exempt from taxation under Section 501(c)(4) of the Internal Revenue Code.

2. Previously awarded Cleanup Grants: The City of Saraland has never received an EPA Brownfields Cleanup Grant for this site or any other site.

3. Expenditure of Existing Multipurpose Grant Funds: The City of Saraland has never received an EPA Brownfields Multipurpose Grant.

4. Site Ownership: The City acquired ownership of the property proposed for the cleanup grant on March 7, 2007 (deed attached).

5. Basic Site Information:

a) Name of the site: Facility is 100-acre property, under development as “*The Land: Saraland Sports & Recreation Complex*” (Sportsplex), and the specific “site” at this Facility (and focus of this application) is the “*Northern Parcel Source Area*”, a 13.65-acre portion of the larger Sportsplex Facility.

b) Address of the site: 7365 Celeste Road, Saraland, AL 36571

6. Status and History of Contamination at the Site

a) Type of Contamination: Hazardous Substances

Environmental investigations conducted at the Facility (including the Northern Parcel Source Area site) have confirmed the presence of hazardous substances, as defined under CERCLA. The primary contamination is associated with non-native “Foreign Material” placed on the property as fill following historical surface mining activities. This material was generated from an offsite industrial source and contains elevated concentrations of polychlorinated biphenyls (PCBs), specifically Aroclor 1248; pentachlorophenol (PCP); hexavalent chromium (Cr VI), and arsenic. These constituents were detected in soil and sediment at concentrations exceeding the EPA Regional Screening Levels (RSLs) for residential land use. In addition, a discrete area containing remnants of buried drums was identified during construction activities. Analytical testing of the drum contents identified hazardous substances, including volatile organic compounds (VOCs), most notably toluene, and PCBs at concentrations exceeding EPA RSLs for residential and industrial soils. The material exhibited a low flash point, indicating the presence of flammable constituents.

b) Operational History and Current Use

Phase I Environmental Site Assessments (ESAs) indicated that the Northern Parcel Source Area was used by a local construction company in the 1960s and 1970s for surface mining of sand and clay materials. The site was wooded prior to these activities. Mining ceased once resources were depleted, after which the site was apparently filled with material from unknown offsite sources.

At the time of purchase by the City in March 2007, the property was covered by grasses and heavy vegetation. A minimal volume of solid waste was observed in a washout area on the northern portion of the site and included concrete rubble, asphalt, concrete pipe, galvanized pipe, and crushed coal. Phase I ESAs also documented that the site is listed in EPA records as a Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) facility with a designation of “No Further Remedial Action Planned (NFRAP).” The EPA conducted an initial assessment in October 1997, a site inspection in March 1980, and a Preliminary Assessment in September 1985, after which the site was assigned a low priority and removed from the CERCLIS inventory in December 1993.

The City is currently developing the 100 acre Facility into a multi-use sports and recreation complex. Planned facilities include eight baseball/softball fields, batting cages, three tennis courts, four basketball courts, sixteen pickleball courts, eleven volleyball courts (beach and indoor), parking lots, internal roadways, a maintenance building, restroom facilities, concession stands, and significant greenspace. The City issued approximately \$72,000,000 in municipal bonds to finance construction, with repayment supported by revenues from sports tournaments and tourism. Construction began in early 2024 and has been significantly constrained by the discovery of hazardous substances at the site, especially on the Northern Parcel Source Area (the focus of the grant application).

c) Environmental Concerns

Environmental concerns are primarily associated with the presence of imported or disposed Foreign Material containing hazardous substances. Constituents of concern include PCBs, PCP, C(VI), and arsenic, which are believed to have originated from offsite industrial sources. The Foreign Material is visually distinguishable from native soils and, in some areas, exhibits a distinct odor.

A secondary concern involves a discrete area containing remnants of buried drums. The drums contained a viscous, resin-like material with elevated VOC concentrations and a low flash point. Although limited in extent and not considered a primary source of site-wide contamination, the drum area represents a localized hazardous substance concern requiring removal and proper disposal.

d) How the Site Became Contaminated, Nature and Extent of Contamination

Based on historical information, site observations, and subsurface investigations, contamination at the site is attributed to the placement of non-native Foreign Material following the cessation of surface mining activities in the late 1970s to early 1980s. After mining operations ended, the site was apparently used by third parties for the placement of imported fill material from offsite industrial sources prior to the City’s acquisition. This material is physically distinct from native soils and is considered the source of the hazardous substances identified at the site.

During cut-and-fill construction activities in August 2024, gray, non-native material accompanied by odors was encountered in the northern portion of the site. Environmental sampling confirmed the presence of PCBs, PCP, chromium VI, and arsenic at concentrations exceeding EPA RSLs for residential land use.

Following this discovery, the City conducted supplemental investigations to delineate the horizontal and vertical extent of contamination. These investigations included test pits, soil borings, surface soil sampling, trenching, and installation of groundwater monitoring wells.

The Northern Parcel Source Area (and focus of this grant application) contains the primary volume of Foreign Material, encompassing approximately 7.5 acres of the former sand and gravel mining pit and extending to depths of up to 35 feet below ground surface. The volume of material present is estimated at approximately 168,000 cubic yards. Analytical data indicate that contaminant concentrations are largely confined to the Foreign Material, with underlying native soils generally not exceeding residential RSLs.

A discrete Drum Area was identified in the Northern Parcel Source Area, where remnants of approximately ten drums were encountered near the surface. Analytical testing confirmed the presence of toluene and PCBs in the drum contents at concentrations exceeding RSLs, and the material exhibited a low flash point. Trenching and soil sampling confirmed that contamination associated with the Drum Area appears limited in extent, with no evidence of significant migration into surrounding soils.

Groundwater investigations indicate that groundwater flow across the site is generally to the west-southwest. Analytical results show limited detections of certain constituents, with PCBs generally not detected and only isolated detections of PCP and chromium VI slightly above screening levels. Soil and groundwater data indicate minimal vertical migration of contaminants and no significant impact to groundwater.

All assessment activities have been performed voluntarily in coordination with EPA Region 4 and the Alabama Department of Environmental Management (ADEM) through ADEM's Voluntary Cleanup Program (VCP).

7. Brownfields Site Definition: The site is not listed or proposed for listing on the National Priorities List; is not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA; and is not subject to the jurisdiction, custody, or control of the U.S. government. On October 24, 2024, EPA Region 4 reviewed and approved the site as eligible for EPA Brownfields Assessment activities under the South Alabama Regional Planning Commission (SARPC) Brownfields Assessment Grant. A copy of the approved Site Eligibility Determination form is attached.

8. Environmental Assessment Required for Cleanup Grant Applications: Saraland has completed the environmental assessments required to support this Cleanup Grant application. A Phase I Environmental Site Assessment (ESA) was conducted on January 30, 2007, in accordance with ASTM E1527 standards in effect at the time and prior to the City's acquisition of the property. A subsequent Phase I ESA was completed on October 27, 2022, to reevaluate site conditions in advance of redevelopment.

Following the discovery of non-native fill material during construction activities, an ASTM E1903-19–equivalent Phase II Environmental Site Assessment was completed on November 6, 2024. The Phase II ESA confirmed the presence of hazardous substances in soil, including PCBs, PCP, and Cr(VI), at concentrations exceeding applicable EPA RSLs. In addition, a discrete area containing buried drums was identified, with analytical testing confirming elevated concentrations of VOCs (including toluene) and PCBs, along with a low flash point.

Subsequent to completion of the Phase II ESA, the City conducted additional site investigations to further delineate the horizontal and vertical extent of contamination and to support cleanup planning. These

activities included additional soil borings, test pits, surface soil sampling, trenching, installation and sampling of groundwater monitoring wells, and surface water and sediment sampling. These assessment activities collectively provide a comprehensive characterization of site conditions and support implementation of cleanup actions.

9.b. Site Characterization: The applicant is the City of Saraland, a unit of local government and a non-responsible party that did not cause or contribute to the contamination at the site. The site was enrolled in the Alabama Department of Environmental Management (ADEM) Voluntary Cleanup Program (VCP), and the City is proceeding under State oversight.

ADEM has reviewed the environmental site assessments completed to date and has determined that the site is eligible for the VCP. ADEM has approved site characterization reports and cleanup plans for completed portions of the site and has provided oversight and concurrence sufficient for cleanup to proceed at the Northern Parcel Source Area. Cleanup measures have been implemented on all portions of the site except the Northern Parcel Source Area.

Remediation activities have already been completed for portions of the south of the Northern Parcel Source Area, including the Baseball/Softball Fields Area, in accordance with the approved cleanup plan. The remaining Northern Parcel Source Area contains the largest volume of impacted material and represents the final phase of cleanup necessary to complete redevelopment of the site. No additional environmental assessment is required to characterize the site for remediation.

The City is seeking EPA Brownfields Cleanup Grant funding specifically to implement cleanup measures for the Northern Parcel Source Area. Upon completion of these activities, the City will pursue final regulatory closure for the Northern Parcel Source Area under the VCP. A letter from ADEM letter confirming site eligibility/enrollment in ADEM's VCP, acknowledging the FY26 Cleanup Grant application, and that sufficient site characterization for cleanup to begin is attached.

10. Enforcement or Other Actions: There are no known ongoing or anticipated environmental enforcement or other actions related to the site for which Brownfields Cleanup Grant funding is sought. The City of Saraland is not aware of any federal, state, or local government inquiries, orders, directives, or liens regarding responsibility of any party, including the City, for contamination or hazardous substances at the site.

The site is currently enrolled in the ADEM VCP. Participation in the VCP is voluntary and is not the result of, nor associated with, any enforcement action, order, or directive. Cleanup activities being conducted at the site are proceeding under voluntary state oversight and coordination with ADEM and U.S. EPA Region 4.

No notices of violation, consent orders, unilateral administrative orders, or other enforcement instruments have been issued or are anticipated for the site. The City did not cause or contribute to the contamination and is proceeding as a non-responsible party under the VCP.

11. Sites Requiring a Property-Specific Determination: The City affirms that the site does **not** require a Property-Specific Determination under the FY26 Brownfields Cleanup Grant Guidelines.

On October 1, 2024, the South Alabama Regional Planning Commission (SARPC) submitted a completed Brownfields Site Eligibility Determination (SED) checklist to EPA Region 4 for review, including information addressing statutory eligibility criteria and applicability of Property-Specific Determination

requirements. Following EPA Region 4 staff review and coordination with the City of Saraland to clarify site conditions and regulatory context, EPA Region 4 approved the SED on October 24, 2024.

The signed SED, executed by EPA Region 4 staff, confirms that the site is eligible for EPA Brownfields funding and does not require a Property-Specific Determination. Documentation is attached.

12. Threshold Criteria Related to CERCLA/Petroleum Liability: The site is contaminated with hazardous substances. The City of Saraland is eligible for EPA Brownfields Cleanup Grant funding because it meets the requirements for asserting an affirmative defense to CERCLA liability through the Bona Fide Prospective Purchaser (BFPP) liability protection pursuant to CERCLA §101(40). Sections 12.a.i and 12.a.ii do not apply.

a. Property Ownership Eligibility – Hazardous Substance Site

iii. Landowner Protections from CERCLA Liability

(1) Bona Fide Prospective Purchaser (BFPP) Liability Protection: The City of Saraland asserts BFPP liability protection for the site and demonstrates compliance with all applicable statutory requirements, as detailed below.

(a) Information on the Property Acquisition: The following information addresses items (i) through (v) of the EPA guidance:

(i) How the property was acquired: The City acquired ownership of the property through a voluntary, arm's-length purchase from a private party.

(ii) Date the property was acquired: March 7, 2007.

(iii) Nature of ownership: The City holds fee simple ownership and is the sole owner of the property.

(iv) Transferor: Hill Builders, Inc.

(v) Affiliations: The City does not have, and has never had, any familial, contractual, corporate, or financial relationship or affiliation with any prior owner, operator, or other potentially responsible party associated with the property, including the transferor.

(b) Pre-Purchase Inquiry (All Appropriate Inquiries): The following information addresses items (i) through (iii) of the EPA guidance:

(i) Types of site assessments performed: Prior to acquisition, the City conducted an ASTM E1527 Phase I Environmental Site Assessment (ESA), with a report date of January 30, 2007. The assessment was performed specifically for the City of Saraland.

(ii) Environmental Professional: The Phase I ESA was conducted by Thompson Engineering, an Environmental Professional as defined in 40 CFR §312.10. The required Environmental Professional declaration is included in the written Phase I ESA report.

(iii) Timing of AAI: The Phase I ESA was completed within 180 days prior to the City's acquisition of the property on March 7, 2007, satisfying the timing requirements for All Appropriate Inquiries and BFPP liability protection.

(c) Timing and/or Contribution Toward Hazardous Substances Disposal: The following information addresses the EPA guidance requirements for this subsection:

- All disposal of hazardous substances at the site occurred prior to the City's acquisition of the property.
- The City did not cause or contribute to any release or threatened release of hazardous substances at the site.
- The City has not, at any time, arranged for the disposal of hazardous substances at the site.
- The City has not, at any time, transported hazardous substances to the site.

(d) Post-Acquisition Uses: The following information addresses EPA guidance item (d):

- Following acquisition of the property in 2007, the site remained vacant and unused until construction of the City's multi-use sports and recreation complex began in early 2024.
- Since 2024, the City has been developing the sports complex across the property in accordance with approved plans, including construction of athletic fields, courts, infrastructure, and associated facilities.
- Upon discovery of environmental impacts during construction activities, the City immediately halted all development activities within the Northern Parcel Source Area and has not resumed construction in that area pending completion of remediation.
- Development and construction activities have continued in other portions of the site where cleanup measures have been approved and implemented under regulatory oversight.
- No third parties have leased, operated, occupied, or otherwise used the property during the City's ownership, and the City has had no relationship with any prior users of the property.

(e) Continuing Obligations: The following information addresses EPA guidance items (e)(i) through (e)(iv):

Since discovery of environmental impacts during construction activities, the City has exercised appropriate care and taken reasonable steps with respect to hazardous substances found at the site to:

- (i) Stop any continuing releases;
- (ii) Prevent any threatened future releases; and
- (iii) Prevent or limit exposure to any previously released hazardous substances.

Actions taken include, but are not limited to:

- Notifying construction personnel of the discovery of impacted materials;
- Issuing stop-work orders and terminating excavation activities in impacted areas;
- Securing and restricting access to impacted areas through fencing and increased site security;
- Covering exposed drums and impacted materials to prevent exposure and migration;

- Coordinating promptly with the Alabama Department of Environmental Management (ADEM) and U.S. EPA Region 4; and
- Advancing site assessment, interim remediation, and cleanup activities under regulatory oversight.

The City further affirms that it:

- (i) Is complying with, and will continue to comply with, all land use restrictions and will not impede the effectiveness or integrity of any institutional controls;
- (ii) Is assisting and cooperating with those performing the cleanup and providing full access to the property;
- (iii) Has complied and will comply with all CERCLA information requests and administrative subpoenas that have been or may be issued; and
- (iv) Has provided and will continue to provide all legally required notices.

Eligibility Summary

The City of Saraland acquired the property after January 11, 2002; conducted All Appropriate Inquiries prior to acquisition; did not cause or contribute to contamination; and has taken and continues to take appropriate care with respect to hazardous substances at the site. Accordingly, the City qualifies for Bona Fide Prospective Purchaser liability protection and is eligible to receive EPA Brownfields Cleanup Grant funding for the site.

13. Cleanup Authority and Oversight Structure: The City of Saraland will comply with all applicable federal and State laws and will ensure that cleanup activities at the site are conducted in a manner protective of human health and the environment.

a. Cleanup Oversight: The site is enrolled in the ADEM VCP, and cleanup activities are proceeding under State regulatory oversight. The City has overseen preparation and regulatory review of all site characterization reports for the entire facility and has obtained approval of cleanup plans and implemented cleanup measures for portions of the site outside the Northern Parcel Source Area. Conceptual approval for the cleanup approach for the Northern Parcel Source Area has also been obtained through coordination with ADEM and U.S. EPA Region 4. The City is seeking formal EPA Brownfields Cleanup Grant funding to implement the approved cleanup approach for the Northern Parcel Source Area.

The City has played an active role in all regulatory coordination, negotiations, and approvals to date and has overseen contractors performing assessment, interim remediation, and cleanup work across the Facility. City staff have significant experience managing complex public works and environmental projects and will continue to provide direct oversight of consultants, contractors, schedules, budgets, and regulatory compliance throughout the cleanup process.

Cleanup activities for the Northern Parcel Source Area will be implemented consistent with Alternative 3 – Risk-Based Site Cleanup, as described in the Analysis of Brownfields Cleanup Alternatives (ABCA). This approach relies on risk-based evaluations conducted under ADEM’s ARBCA guidelines for PCP and Cr(VI) and under 40 CFR 761.61(c) for PCBs. Risk-based cleanup approvals have already been implemented for other portions of the facility, and remaining work will apply the same regulatory framework to the Northern Parcel Source Area.

The conceptual cleanup approach for the Northern Parcel Source Area includes consolidation of impacted materials, removal and offsite disposal of buried drums and associated soils, and placement of a protective exposure barrier consisting of clean fill. Institutional and engineering controls, including groundwater use restrictions and long-term management of the exposure barrier, will be documented through an Environmental Covenant and associated plans. These controls have been prepared, reviewed by ADEM, and are in the process of final execution.

The City has retained a Qualified Environmental Professional (QEP) to oversee remediation activities, conduct confirmation sampling, and coordinate directly with ADEM and EPA. City staff will maintain overall project management responsibility and ensure that cleanup activities are implemented in accordance with approved plans, regulatory requirements, and grant conditions. All procurement and contracting will comply with the City's procurement policies and applicable federal requirements, including 2 CFR Part 200, 2 CFR Part 1500, applicable provisions of 40 CFR Part 33, and EPA procurement guidance.

b. Access to Adjacent or Neighboring Properties: Cleanup activities are not anticipated to require access to adjacent or neighboring properties. The City owns the subject property as well as adjacent parcels to the north, west, and east, and all cleanup response activities can be completed within property boundaries under City control.

The City will continue to keep the community informed of cleanup progress through public meetings, stakeholder coordination, and updates on the City's website. If unforeseen conditions require coordination beyond site boundaries, the City has the authority and capacity to secure any necessary access agreements, easements, or rights-of-entry.

14. Community Notification

The City of Saraland provided timely and appropriate notice to the community of its intent to apply for an EPA Brownfields Cleanup Grant and afforded the public an opportunity to review and comment on the draft application, including the draft ABCA, in accordance with EPA requirements.

Upon discovery of environmental impacts during construction activities, the Mayor issued a public press release and video communication explaining the findings, regulatory coordination, and the City's planned response. Additional community notification activities specific to this EPA Brownfields Cleanup Grant application are described below.

a. Draft Analysis of Brownfields Cleanup Alternatives

The City made a draft copy of the EPA Brownfields Cleanup Grant application, including a draft ABCA, available for public review and comment. The draft ABCA summarizes site conditions and contamination issues; applicable cleanup standards and regulatory authorities; the cleanup alternatives evaluated; and the proposed cleanup approach for the site, including effectiveness, implementability, resilience, cost considerations, and overall reasonableness.

The draft grant application and draft ABCA were presented at a public meeting held on **January 22, 2026**, and instructions were provided regarding where and how the documents could be reviewed prior to submittal of the final application.

b. Community Notification Ad

The City published a community notification advertisement on **January 7, 2026**, more than 14 calendar days prior to submission of this application, announcing its intent to apply for an EPA Brownfields Cleanup Grant and providing notice of the public meeting scheduled for January 22, 2026.

Multiple notification methods customarily used to communicate with the target community were employed, including publication in the *Daily Call* newspaper, posting of meeting notices in the Saraland City Hall lobby and other prominent public locations, and placement of notices on the City's website and official social media platforms.

The community notification clearly stated that the draft grant application and draft ABCA were available for public review, identified where the documents could be accessed, explained how public comments could be submitted, and provided the date, time, and location of the public meeting. The notification methods used were accessible to community members, including individuals with limited English proficiency and persons with disabilities.

c. Public Meeting

A public meeting to discuss the draft EPA Brownfields Cleanup Grant application and draft ABCA was held on **January 22, 2026, at 6:00 p.m.** The meeting was open to the public with no pre-registration required. Copies of the draft application and draft ABCA were made available, and attendees were provided with instructions on how to review the documents and submit comments prior to application submittal.

City representatives presented an overview of site conditions, contamination issues, the proposed cleanup approach, and the regulatory oversight structure. Time was provided for public questions and comments. No public comments were received at the meeting or during the public comment period.

d. Submission of Community Notification Documents

The City has included the following documentation as attachments to this application to demonstrate compliance with EPA community notification requirements:

- A copy of the draft ABCA;
- Proof of the community notification advertisement and other notification methods demonstrating public notice at least 14 calendar days prior to application submittal;
- A meeting sign-in sheet/participant list from the January 22, 2026 public meeting;
- Meeting notes and minutes; ; and
- A statement confirming that no public comments were received and, therefore, no responses were required.

15. Contractors and Named Subrecipients

Contractors: The City of Saraland will administer all EPA Brownfields Cleanup Grant activities and grant finances; however, the City does not maintain in-house technical capacity to perform the specialized environmental engineering, regulatory coordination, grant administration, and cleanup oversight services required for this project. To accomplish these tasks, the City selected a Qualified Environmental Professional (QEP) through a competitive procurement process and has entered into contract with PPM Consultants, Inc. (PPM) to provide environmental and brownfields professional services that will be compensated with EPA funds made available under this opportunity, if awarded.

The City's procurement process began with development of a formal *Request for Proposals (RFP) for Engineering and Administrative Services for the City of Saraland Sportsplex Multipurpose Field Remediation Project*, which was advertised on November 13, 2025. In preparing the RFP, the City sought guidance from the New Jersey Institute of Technology (NJIT) Technical Assistance to Brownfields (TAB) program to ensure that the solicitation was consistent with EPA Brownfields procurement requirements and did not include restrictive or exclusionary language. The RFP was publicly advertised on December 13, 2025, with proposals due by December 15, 2025. It was advertised on the City of Saraland website consistent with our standard procurement practices and promoted through bid aggregator/bid board services throughout the region such as BidNet Direct, Starbridge.ai, and TN Valley Classified Ads. The response period remained open for a minimum of 30 calendar days, consistent with EPA guidance for full and open competition.

The solicitation outlined a clear scope of services, evaluation criteria, and submission requirements, and expressly stated that all procurements would comply with 2 CFR Part 200, 2 CFR Part 1500, and 40 CFR Part 33. The RFP established weighted evaluation criteria, including firm qualifications and experience, project team and personnel, technical approach, and cost proposal. Cost reasonableness was included as a selection factor, consistent with EPA guidance on competitively procuring contractors. Proposals were evaluated by a City selection committee using the criteria set forth in the RFP.

At the conclusion of the solicitation period, one proposal was received. In accordance with EPA procurement guidance and 2 CFR 200.324(b), the City conducted a cost and price reasonableness review prior to award. Because the contract value exceeds the Simplified Acquisition Threshold and was awarded without price competition, the City required the selected firm to disclose its proposed profit margin as a separate element of the contract price, as required by federal regulations. In response to a formal request from the City, PPM provided written documentation detailing its profit margins and benchmarking those margins against published industry data from the Deltek Clarity: Architecture & Engineering Industry Study, a widely recognized industry benchmark. The documentation demonstrated that PPM's profit margins are below industry averages for similar sized environmental and engineering consulting firms and are therefore reasonable and consistent with market conditions. The City reviewed this information, exercised independent judgment regarding cost and profit reasonableness, and determined that the proposed pricing and profit margin were fair, reasonable, and acceptable. This review satisfied the federal requirement to negotiate and document profit as a separate element of price when only one proposal is received.

The City selected PPM using fair and open competition requirements consistent with 2 CFR Part 200, 2 CFR Part 1500, and 40 CFR Part 33, as well as EPA guidance documents including the *Brownfields Grants: Guidance on Competitively Procuring a Contractor*. The City Council authorized the Mayor to enter into an agreement with PPM following completion of the price reasonableness and profit justification review, and the contract was executed thereafter.

Copies of the RFP, documentation of the procurement process, and the executed contract are attached.

Named Subrecipients: No subrecipients are proposed or named under this application.

EDWARD F. POOLOS
DIRECTOR

JEFFERY W. KITCHENS
DEPUTY DIRECTOR



KAY IVEY
GOVERNOR

Alabama Department of Environmental Management
adem.alabama.gov

1400 Coliseum Blvd. 36110-2400 ■ Post Office Box 301463
Montgomery, Alabama 36130-1463
(334) 271-7700 ■ FAX (334) 271-7950

January 13, 2026

Mayor Joe McDonald
City of Saraland, Alabama
943 Saraland Boulevard South
Saraland, Alabama 36571
jmcdonald@saraland.org

RE: Support Letter, The Land Saraland Sports & Recreation Complex, FY26 EPA Brownfields Cleanup Grant

Dear Mayor McDonald,

I have received your request for a letter of support and technical assistance for the City of Saraland's pursuit of a FY26 Brownfields Cleanup Grant from the U.S. Environmental Protection Agency (EPA) for the referenced site. The Alabama Department of Environmental Management (ADEM) is eager to support your efforts in this exciting redevelopment.

ADEM understands that the city is constructing a large sports complex along the west side of Celeste Road in Saraland, Mobile County, Alabama. When completed, this complex will include numerous baseball, softball, soccer, and lacrosse fields; tennis and pickleball courts; playgrounds; parking lots; concession stands; and green spaces. During the development of the facility, foreign material previously dumped at the site prior to City purchase was encountered. Significant sampling efforts have determined that this material contains polychlorinated biphenyls (PCBs), pentachlorophenol (PCP), hexavalent chromium, and arsenic at concentrations greater than the EPA Regional Screening Levels (RSLs) for residential use. Five multi-use fields for soccer, lacrosse, and football were planned for the northern portion of the facility; however, due to the presence of this foreign material, the design for this area may have to be modified.

The Department understands that the EPA Cleanup Grant guidelines require the State Environmental Authority to affirm that the site is eligible for enrollment in a Voluntary Cleanup Program (VCP) and that sufficient site characterization has been completed for remediation work to begin. The city has already enrolled the site into the VCP, and a significant level of site characterization has already been conducted and approved by ADEM and the EPA Toxic Substances Control Act (TSCA) Unit. Both agencies have been involved in the assessment and cleanup efforts thus far, and it appears that a sufficient level of site assessment data has been completed to move forward with the additional cleanup of the northern parcels. ADEM will continue to work with you to secure a Letter of Concurrence once cleanup is complete.

Further, at this time, the Department sees no reason you could not begin remedial efforts immediately using your existing assessment data while you pursue the EPA cleanup grant to secure the funds to complete the entire project. The extent of impact in soil and groundwater has been delineated. If additional assessment is conducted, we will work with you to ensure prompt review of any new data you choose to obtain so it is completed by June 15, 2026, as requested by the EPA guidelines.



Birmingham Office
110 Vulcan Road
Birmingham, AL 35209-4702
(205) 942-6168
(205) 941-1603 (FAX)

Decatur Office
2715 Sandlin Road, S.W.
Decatur, AL 35603-1333
(256) 353-1713
(256) 340-9359 (FAX)

Coastal Office
1615 South Broad Street
Mobile, AL 36605
(251) 450-3400
(251) 479-2593 (FAX)

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The City may also be interested in potential technical assistance from ADEM on the project, which might include public outreach/visioning sessions. Upon request, the Department will be happy to discuss available assistance as the project and specific needs develop. ADEM looks forward to supporting your efforts for the exciting redevelopment plans underway. We wish you and the residents of the community success in the pursuit of funds to complete the project. Please let us know if we can be of further assistance.

For any questions regarding this letter, please contact Crystal L. Collins at 334-279-3067 or via email at ccollins@adem.alabama.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Crystal L. Collins".

Crystal L. Collins, Chief
Redevelopment Unit
Land Division
Alabama Department of Environmental Management



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Birmingham, AL 35209-4702
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