



## **Henderson School Alumni Association Trust (HSAAT)**

P. O. Box 1607 Jackson, Ga. 30233  
1708 Delowe Dr.SW Atlanta, Ga. 30311  
404-754-3073/770-843-8854  
[hendersonrepurpose@gmail.com](mailto:hendersonrepurpose@gmail.com)

### **Narrative Information Sheet**

**1. Applicant Identification:**

- a. Henderson School Alumni Association Trust, Inc.  
1708 Delowe Dr. SW Atlanta, Georgia 30311

**2. Website**

- a. [www.hendersonrepurpose.com](http://www.hendersonrepurpose.com)

**3. Funding Requested:**

- a. **Grant Type:** Single Site Cleanup
- b. **Federal Funds Requested:** \$499,950

**4. Location:**

- a. **City:** Jackson
- b. **County:** Butts
- c. **State:** Georgia

**5. Property Information:**

- a. **Property Name:** Henderson School
- b. **Site Address:** 820 North Mulberry Street Jackson GA 30233

**6. Contacts:**

**a. Project Director:**

- i. **Name:** Harvey Norris
- ii. **Phone:** [REDACTED]
- iii. **Email:** [REDACTED]
- iv. **Address:** [REDACTED]

**b. Chief Executive:**

- i. **Name:** Charlie (Chuck) Barlow
- ii. **Phone:** [REDACTED]

iii. Email: [REDACTED]

iv. Address: [REDACTED]

**7. Population:**

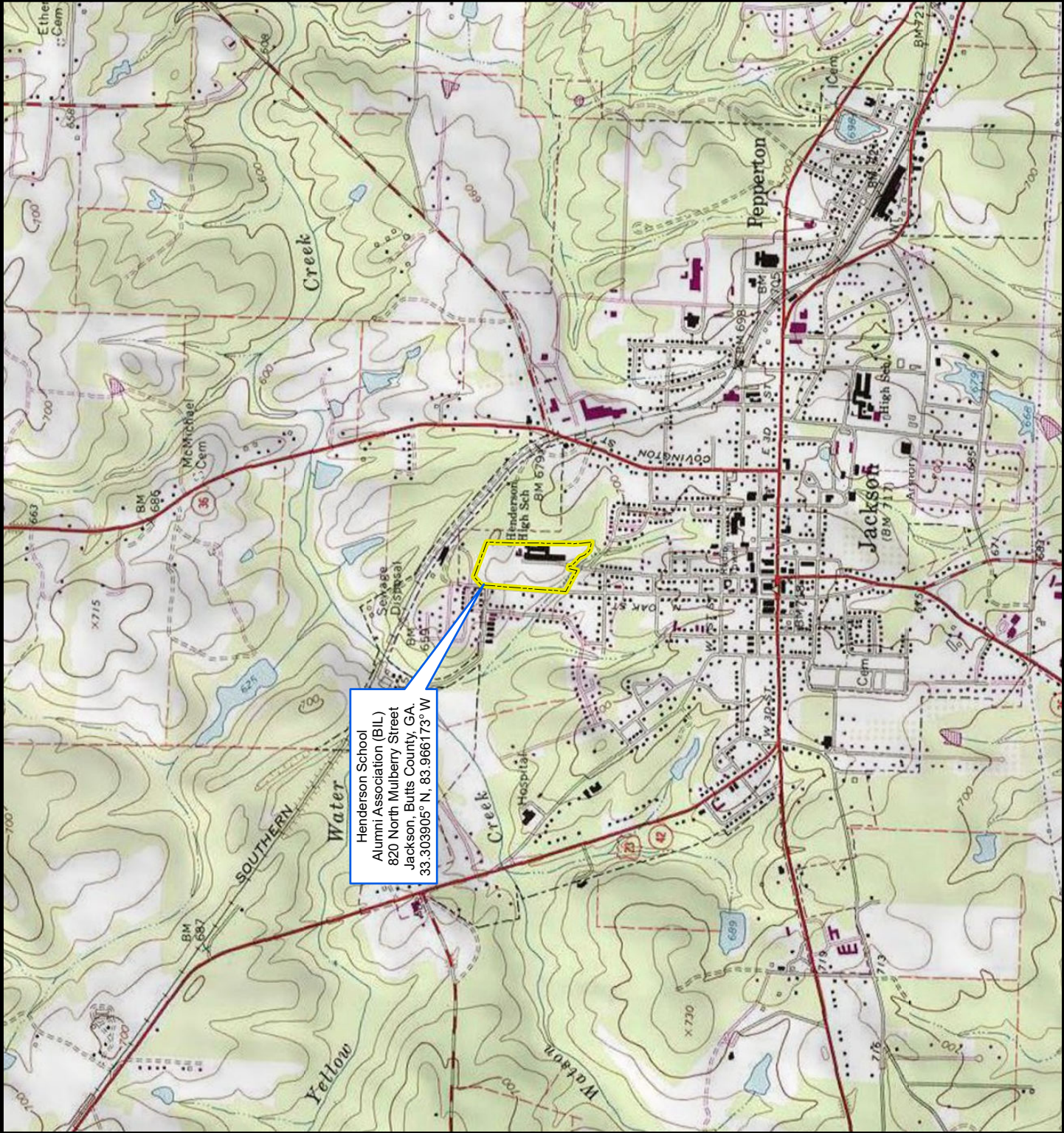
a. City Population: 5,557 (US Census, 2020)

**8. Other Factors:**


Other Factors	Page #
Community population is 15,000 or less.	Pg. 4
The applicant is, or will assist, a federally recognized Indian Tribe or United States Territory.	N/A
The proposed brownfield site(s) is impacted by mine-scarred land	N/A
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.	N/A
The proposed site(s) 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).	N/A
The priority site(s) is in a federally designated flood plain.	N/A
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	N/A
The reuse of the priority site(s) will incorporate energy efficiency measures.	Pg. 3
The proposed project will improve local resilience to the impacts of extreme weather events and natural disasters.	Pg. 3
The target area is located within a community in which a coal-fired power plant has recently closed (2015 or later) or is closing.	N/A

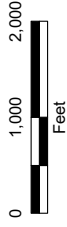
**9. Releasing Copies of Applications**

a. Not Applicable



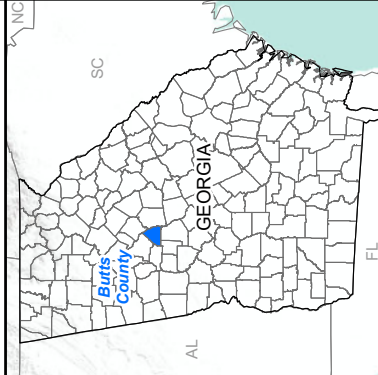
**Legend**

 Subject Property



Note: Coordinates provided are the geographic center of site boundary shown.

Map Source: USGS 7.5 Minute Topographic Quadrangle Map: Jackson, GA 1987.



United States Environmental Protection Agency  
Region 4

**FIGURE 1**

**Subject Property Location**

**Site Name:** Henderson School Alumni Association (BIL)

**TOLIN No.:** 22-0027

**City:** Jackson  
**County:** Butts  
**State:** Georgia



**Date:** 3/2/2023  
**Analyst:** dale.vonbusch

Henderson School  
Alumni Association (BIL)  
820 North Mulberry Street  
Jackson, Butts County, GA  
33.303905° N, 83.966173° W

**Henderson School Alumni Association Trust  
Jackson, Georgia | Brownfields Cleanup Grant FY25**

**(1) PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION**

**Target Area and Brownfields**

a. Overview of Brownfield Challenges and Description of Target Area - The rural city of Jackson, located in Butts County, GA, faces significant economic challenges including a poverty rate of 22.7% compared to 10.6% at the national average (7.2%), coupled with elevated unemployment levels (7.2%). These conditions create a persistent cycle of economic hardship that limits opportunities for residents and hampers broader community development efforts.

The geographic boundary and target area for this grant encompasses the City of Jackson's city limits, with particular focus on the downtown core and adjacent neighborhoods where abandoned commercial and industrial structures have accumulated. The City's isolated and rural character, combined with limited access to higher education, social services, and economic diversification, has contributed to ongoing economic stagnation. While the County has attracted some distribution and manufacturing employment, the City of Jackson itself struggles with disinvestment, abandonment, and blight.

The presence of a contaminated, underutilized facility in the heart of the community further restricts the area's ability to attract investment and create quality jobs for local residents, while the site's continued vacancy depresses surrounding property values and signals disinvestment to potential employers. Once environmental hazards are addressed, the Site can be transformed into the Henderson Innovation Business & Community Center (HIBCC) that supports workforce development and educational programming that aligns with incoming economic opportunities.

b. Description of the Proposed Brownfield Site - The former Henderson School occupies a 20.43-acre tract at 820 North Mulberry Street in Jackson, GA, located in Butts County. This site is bordered to the north by developed residential properties, followed by Charlie Shephard Road, then followed by undeveloped wooded areas; to the east by developed suburban residential areas; to the west by North Oak Street followed by residential properties; and to the south by Henderson Street and Glenn Street with vacant land, residences, and commercial properties beyond. A 48-unit public housing development is within ½ mile.

The site includes five buildings: two school buildings (49,886 and 19,381 square feet), an 8,235-square-foot gymnasium, and two portable classrooms. Prior to 1938, the land was undeveloped. The current buildings operated as a school from 1955-2010 and prior to 1955 the land was undeveloped. The site has been vacant since 2010. In 2017, the applicant, Henderson School Alumni Association Trust (HSAAT), formed to purchase and renovate the facility.

A Phase II ESA in November 2023 found 18 ACM samples containing greater than 1% asbestos, with concentrations exceeding 3% in insulation, floor tiles, roofing materials, and exterior awning panels. Nine locations revealed lead content equal to or exceeding EPA standards, and the assessment identified potential PCB-containing ballasts and mercury equipment throughout. Despite these challenges, recent structural assessments confirm the buildings remain fundamentally sound and well-suited for renovation.

While the school's interior facilities cannot be fully utilized due to environmental contamination, the exterior grounds and gymnasium have become active community assets. HSAAT currently operates athletic and exercise programs, hosts a summer reading camp to address local literacy

challenges, and organizes spring and summer festivals for community engagement. The gymnasium, yard, and football field are also available for rental to for-profit organizations for fundraising events, generating revenue to support HSAAT's mission. HSAAT is currently building The Community Learning Garden with funding from Amazon which addresses critical gaps in the community including limited recreational spaces, few intergenerational programming opportunities, and insufficient access to fresh food.

Despite this progress, the environmental contaminants in the main school buildings and gymnasium must be properly abated before full renovation and utilization can occur.

### **Revitalization of the Target Area**

c. Reuse Strategy and Alignment with Revitalization Plans - The proposed reuse strategy balances careful renovation and reuse of the existing buildings with intentional and mission-aligned development of the site to generate revenue.

After remediation, the gymnasium (8,235SF) will become a Boys and Girls Club (BGC) and HSAAT has already begun planning with the BGC of Central Georgia about use of the space. The main school building (49,886SF) will become the HIBCC and will include a cafe in the cafeteria to support culinary skill training. At the southern end of the site, the secondary school building (19,381SF) will be a Community Wellness Center which will focus on addressing chronic illnesses through health education (nutrition, stress management, exercise, physical therapy, etc.).

The plan for the HIBCC came out of a community charrette that was led by staff from the Georgia Institute of technology and further supported by an October 2023 to February 2024 EPA Office of Brownfields and Land Revitalization (OBLR) funded a technical assistance (TA) project that supported HSAAT with refining their goals and developing a plan for the HIBCC.

The HIBCC aligns with both the City of Jackson Comprehensive Plan 2018-2038 and Three Rivers Regional Commission (TRRC) Plan 2019-2039, including the adaptive reuse of historic structures. Both Jackson and TRRC recognized the lack of youth recreational activities and facilities as a community weakness, which will be addressed through the BGC reuse strategy. The development of the HIBCC for workforce development and training will support Jackson's need for diversified labor skills and the TRRC's need for a skilled technological workforce and entrepreneur program offerings.

Minimal alterations to the overall building layout allow HSAAT to utilize the space immediately after remediation. The north six acres of the site will remain for recreational and athletic use. Directly east of the main entrance, an open space will be retained for community gatherings and other nonprofit events. According to FEMA Flood Map No. 13035C0090D (effective June 2017), the site is located in Zone X, an area of minimal flood hazard, at an elevation of 650-680 feet above sea level. The site's elevation and distance from Yellow Water Creek (0.3 miles) ensure that the proposed cleanup alternatives will not be adversely affected by flooding or extreme weather events.

d. Outcomes and Benefits of Reuse Strategy - The remediation and redevelopment of the Site into the HIBCC will stimulate economic development in this rural community while creating a nonprofit facility that addresses critical gaps in workforce readiness, youth development, and community health.

The HIBCC will generate direct economic benefits through job creation at multiple levels. Construction and remediation activities will create short-term employment opportunities for local contractors and laborers. Once operational, the facility will require permanent staff to operate the Boys and Girls Club, workforce training programs, culinary training cafe, and Community Wellness Center. Beyond direct employment, the HIBCC's workforce development programming will produce broader economic impacts by preparing Butts County residents to fill positions with incoming logistics, manufacturing, and high-tech employers. This approach ensures that new industries benefit the local tax base and reduce unemployment rather than drawing workers from Atlanta or Macon.

The project will improve health and wellness outcomes for an underserved population. The north six acres of the site will remain for athletic use. Directly east of the main entrance, a greenspace will be retained as an area for community gatherings and other events. The Community Wellness Center will provide Jackson residents with access to health programming and services that are currently limited in this rural area. The Community Learning Garden will address food security by training residents in sustainable food production, particularly benefiting the 48-unit public housing development located within half a mile of the site. The culinary training program will reinforce healthy eating habits while providing marketable job skills.

Youth in Jackson and Butts County will gain access to structured programming and safe recreational space that does not currently exist. The BGC will provide after-school and summer programming that supports academic achievement and keeps young people engaged. Athletic programs and community events will offer positive outlets for youth and families, addressing a gap that both local and regional plans have identified as a barrier to quality of life and economic competitiveness.

The site's minimal flood risk and structurally sound buildings provide a resilient foundation for long-term community investment. The buildings occupy a small portion of the 20.43 acres site, with the rest of the property remaining greenspace which helps to absorb stormwater during heavy rain events. At the same time, the revitalized buildings can act as a community shelter and food distribution hub during natural disasters. Energy efficiency measures incorporated into the renovation, including efficient lighting and HVAC systems, will reduce operational costs.

### **Strategy for Leveraging Resources**

e. Resources Needed for Site Characterization - As part of the EPA's Targeted Brownfield's Assessment (TBA), HSAAT completed Phase I and Phase II Environmental Site Assessments (ESAs) and developed the targeted site's ABCA. These assessments sufficiently characterized the site so HSAAT does not anticipate the need for additional site characterization. However, in the unlikely event that HSAAT requires additional funding, alternative funding will be sought from such entities as the USDA, the Georgia DCA, GAEPD, or other local, state, or federal sources.

f. Resources Needed for Site Remediation - HSAAT is requesting EPA Brownfields Cleanup funding sufficient to complete the remediation of the former Henderson School site. However, as with any contaminated site, unforeseen circumstances may add additional time and cost to the remediation. If the cost exceeds this budget, HSAAT will seek remediation grants from the City of Jackson to complete the site remediation.

g. Resources Needed for Site Reuse - HSAAT will seek funding from local, state, and federal resources to achieve its goal of redevelopment. USDA Rural Development Community Facilities grants will be pursued to develop the BGC while programs from the U.S. Economic Development Administration and the U.S. Department of Labor Workforce Opportunity for Rural Communities Initiative will be pursued to develop HIBCC.

h. Use of Existing Infrastructure - Existing water, sewer, and electrical services at the targeted site are of the needed size and capacity to be re-used for the planned redevelopments. HSAAT's redevelopment priority is based on infrastructure reuse but will work with developers when new infrastructure is required.

## **(2) COMMUNITY NEED AND COMMUNITY ENGAGEMENT**

### **Community Need**

a. The Community's Need for Funding - The Site is in the small, low-income community of Jackson, which has a population of 5,557. The City faces significant economic challenges that limit its ability to fund environmental assessment and remediation independently. According to the American Community Survey (ACS), Jackson's median household income of \$44,508 is dramatically lower than Georgia's median of \$79,991. With a poverty rate of 22.7% in Jackson—nearly double Georgia's rate of 12.6%—and an employment rate of just 47.4% compared to the state's 60.9%, the community lacks the tax base and economic resources to address brownfield contamination without federal assistance. These fiscal constraints make EPA grant funding essential for environmental cleanup and subsequent community revitalization efforts.

Further, HSAAT does not have the financial resources to complete the proposed site remediation work described herein for the former Henderson School site without financial assistance. HSAAT formed to transform and repurpose the site into HIBCC that provide lifelong learning, support, and resources to Jackson students, families, citizens, and communities. While HSAAT is leading the redevelopment efforts, they are a not-for-profit entity and cannot finance the remediation efforts independently. This grant will directly enable cleanup of the site that would not occur without EPA support allowing reuse of the site to move forward by cleanup up the contamination that constrains future redevelopment of the site.

b. Health or Welfare of Sensitive Populations - The target area contains significant sensitive populations facing health and welfare challenges. In Jackson, according to the ACS, 28.7% of children under age 18 live in poverty leaving young residents vulnerable to environmental health hazards. Educational attainment is also limited, with only 11.6% of Jackson residents holding bachelor's degrees, compared to 36.3% statewide, which correlates with reduced access to health information and resources. This grant will address these vulnerabilities by remediating contaminated properties, reducing exposure risks for children and economically disadvantaged residents, and enabling reuse that supports community health and economic opportunity.

c. Greater Than Normal Incidence of Disease and Adverse Health Conditions -

CDC PLACES data reveals that residents in Jackson experience elevated rates of chronic disease compared to national averages. The local diabetes rate of 19.5% significantly exceeds the national rate of 13.1%, while heart disease prevalence of 9.6% far surpasses the national average of 7.5%. Asthma rates of 11.6% also exceed the national rate of 10.8%. These conditions can be exacerbated by environmental contaminants, and this grant will enable assessment and cleanup

activities that reduce community exposure to hazardous substances that may contribute to these adverse health outcomes.

d. Economically Impoverished/Disproportionately Impacted Populations -

The target area populations are economically impoverished. According to the ACS, Jackson's poverty rate of 22.7% and employment rate of 47.4% demonstrate severe economic distress compared to Georgia's 12.6% poverty rate and 60.9% employment rate. This grant will help remove contaminants and prevent future exposure, enabling productive reuse that creates local jobs and economic opportunities for these underserved populations.

**Community Engagement**

e. Project Involvement / f. Project Roles

Name of organization/entity/group	Point of contact (name & email)	Specific involvement in the project or assistance provided
City of Jackson	Mayor Carlos Duffey; carlos.duffey@cityofjacksonga.com	Promoting the redevelopment of the Site and assisting with attracting businesses and users of the site once cleanup is complete.
Boys & Girls Club of Central Georgia	Phillip Bryant; pbryant@bgccg.org	Partner with HSAAT to utilize future reuse of the Site for recreational and youth development programming including mentoring, tutoring, and recreational activities
Concerned Clergy In Butts County (CCBCC)	Pastor Dee Sidney; [REDACTED]	Assist with community engagement efforts during the remediation period
Butts County Economic Development Authority	Bob White; bwhite@buttscountyida.com	Connect HSAAT with economic development incentives, including assistance with workforce development during future reuse of the Site
Center for Sustainable Communities Research and Education (SCoRE) at Georgia Tech	Dr. Ruthie Yow; ryow6@gatech.edu	Assist with community engagement efforts during the remediation period

g. Incorporating Community Input – HSAAT has developed a comprehensive communication and engagement strategy that ensures meaningful community participation. HSAAT has a history of effective community engagement, including its initial meeting in 2017 that drew 75 City of

Jackson residents and former residents to discuss plans to purchase and renovate the Site as well as the 2023 charette that further developed HSAAT's plans. Besides those events, HSAAT has presented plans to the Butts County Commissioners and held community events at the site to share their plans, including a public meeting to present the draft ABCA.

Going forward, HSAAT will continue to hold quarterly public meetings featuring in-person and virtual attendance options, ensuring broad accessibility for all community members. The Brownfield Project Team will review and evaluate comments and community input during quarterly meetings, recording all community member suggestions and information in the minutes and posting them on the HSAAT website. All suggestions and input will be addressed on an individual basis within two weeks and promptly posted to the HSAAT website for further public review. Project updates will be shared through multiple channels, including the HSAAT website, social media platforms, and local newspaper coverage. Project information is disseminated through partner organizations, local churches, and civic organizations, ensuring a broad reach to the residents of Jackson and Butts County.

**(3) TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING SUCCESS**

a. Proposed Cleanup Plan - In November 2023, a draft ABCA was prepared to address the cleanup associated with the remediation of the Site. The environmental concerns that require remediation prior to redevelopment are the presence of 41,500SF of ACM, 80 windows with ACM window glazing and caulk, 20 sinks with ACM undercoat, 9,400LF of ACM roofing materials (flashing, coating/sealant), 2,300SF of ACM roof decking/ 150SF of ACM boiler insulation, 48LF of ACM insulation for exterior steam lines, 38LF of ACM transite flues, and 1,665SF of lead-paint.

During the abatement process, the ACM is to be abated and disposed according to state regulations. For the LBP abatement, a registered Georgia Lead abatement contractor will perform the lead abatement activities. Appropriate work practices of ACM and lead dust will be deployed to avoid contamination during abatement activities. HSAAT will contract with qualified contractors and qualified environmental professionals (QEP) to complete the cleanup and required plans and assist with oversight and monitoring. The QEP will prepare a cleanup design and a plan for ongoing operations and maintenance (O&M) and submit documents to GA DOE and the EPA for approval. At the conclusion of the cleanup, the QEP will collect confirmation samples to ensure all contaminated material has been properly removed and/or capped and will submit documentation to the EPA to certify the completion of the cleanup activities.

**Description of Tasks/Activities and Outputs**

b. Project Implementation / c. Anticipated Project Schedule / d. Task Activity Lead / e. Outputs

<b>Task 1: Project Management</b>	
i.	<i>Project Implementation:</i> HSAAT Project Director (PD), Project Manager (PM), and Community Involvement Coordinator (CIC) will be responsible for overall execution/management of project: tracking project tasks, schedule and budget; procure and oversee QEP and the cleanup contractor; and report on project activities and accomplishments to stakeholders. HSAAT staff will prepare quarterly reports for submittal to ACRES. QEP will support reporting activities (including quarterly

	ACRES reporting) and will develop a final cleanup report to document all project activities.
ii.	<i>Anticipated Project Schedule:</i> This task will start immediately upon project award and will be ongoing continuously throughout the entire four-year project period. The Work Plan and Cooperative Agreement oversight will start on day of the grant's project period. HSAAT will move forward with the procurement of a Qualified Environmental Professional (QEP) in the first Quarter of the grant.
iii.	<i>Task/Activity Lead:</i> HSAAT Project Director
iv.	<i>Outputs:</i> 15 quarterly reports, 4 Annual Reports, 16 ACRES updates
<b>Task 2: Community Outreach</b>	
i.	<i>Project Implementation:</i> HSAAT will work closely with Jackson area residents. HSAAT will plan and conduct bi-annual community meetings and will meet quarterly with the three city or county government groups. Updates will be provided, and feedback received at all meetings. HSAAT will communicate about the project via a web page. The QEP will support HSAAT with community meetings and drafting articles and press releases.
ii.	<i>Anticipated Project Schedule:</i> This task will commence immediately upon project award and will continue throughout the entire four-year project period, following the community involvement plan described in this grant application.
iii.	<i>Task/Activity Lead:</i> HSAAT Community Involvement Coordinator
iv.	<i>Outputs:</i> 1 public involvement plan (PIP), 8 community meetings, 48 meetings with local governments, 12 press releases or newspaper/web articles
<b>Task 3: Cleanup Planning</b>	
i.	<i>Project Implementation:</i> Activities will include finalizing the ABCA document and a cleanup plan, preparing the quality assurance project plan (QAPP) for confirmation sampling, negotiating and receiving necessary regulatory approvals and federal, state, and local permits, and preparing bid documents for the solicitation of cleanup contractors.
ii.	<i>Anticipated Project Schedule:</i> This task will commence after HSAAT selects a QEP, approximately 90 days after cooperative agreement award, and will continue through the rest of the four-year project period.
iii.	<i>Task/Activity Lead:</i> The QEP will be tasked with technical aspects of the project with oversight from HSAAT Project Director
iv.	<i>Outputs:</i> 1 ABCA, 1 cleanup plan, 1 QAPP, 1 health and safety plan (HASP), 1 O&M plan, 1 set of bid documents
<b>Task 4: Site Cleanup</b>	
i.	<i>Project Implementation:</i> HSAAT will procure a QEP and remediation contractor. Site cleanup activities to be performed as described in Section 3.a and following the cleanup plans developed under Task 3. HSAAT will ensure that solicitations and

	contracts contain clauses required by 29 CFR 5.5 and any applicable EPA guidance to meet Davis-Bacon Act requirements, in coordination with the EPA.
ii.	<i>Anticipated Project Schedule:</i> This task will commence after the first year in the project period and will continue until project closeout.
iii.	<i>Task/Activity Lead:</i> The QEP will be tasked with technical aspects of the project with oversight from HSAAT Project Director
iv.	<i>Outputs:</i> 1 site ready for reuse, 1 Cleanup Completion Report

f. Cost Estimates

Budget Categories		Project Tasks (\$)				Total
		Task 1	Task 2	Task 3	Task 4	
Direct Costs	Personnel	\$1,950	\$3,250	\$3,750	\$0	\$8,950
	Fringe Benefits	\$0	\$0	\$0	\$0	\$0
	Travel	\$0	\$0	\$0	\$0	\$0
	Equipment	\$0	\$0	\$0	\$0	\$0
	Supplies	\$0	\$0	\$0	\$0	\$0
	Contractual	\$4,375	\$8,750	\$21,875	\$0	\$35,000
	Construction	\$0	\$0	\$0	\$456,000	\$456,000
	Other	\$0	\$0	\$0	\$0	\$0
Total Direct Costs		\$6,325	\$12,000	\$25,625	\$456,000	\$499,950
Indirect Costs		\$0	\$0	\$0	\$0	\$0
<b>Total Budget</b>		\$6,325	\$12,000	\$25,625	\$456,000	\$499,950

HSAAT personnel costs are based on an average rate of \$50/hour. QEP contractor costs are based on an average labor rate of \$175/hour. No subawards are anticipated. Please note, no fringe, indirect, equipment or supply costs are requested. All tasks and activities will be supported by the EPA Brownfields grant.

**Task 1—Project Management (\$6,325):** Personnel: Quarterly Reports \$750 (1 hrs per report x 15 reports); Annual Reports \$400 (2 hrs per report x 4 reports); Quarterly ACRES updates \$800 (1 hrs per report x 16 reports). Contractual: Preparation of asbestos removal plans, QAPP, and procurement of abatement contractor \$4,375 (25 hrs x \$175/hr).

**Task 2—Community Outreach (\$12,000):** Public Involvement Plan \$500 (10 hrs x \$50/hr); Community meetings \$2,000 (10 hrs per meeting x 4 meetings); Articles & social media updates \$750 (15 hrs x \$50/hr). Contractual = Meeting attendance, input evaluation, and outreach material preparation support \$8,750 (50 hrs x \$175/hr).

**Task 3—Cleanup Planning (\$25,625):** Personnel = Evaluation of bids, coordination of pre-bid onsite meeting and selection of contractors \$3,750 (75 hrs x \$50/hr). Contractual = Permitting coordination, development of bid documents for cleanup activities, finalization of the ABCA, preparation of QAPP, and a HASP \$21,875 (125 hrs x \$175/hr).

**Task 4 – Site Cleanup (\$456,000):** Construction = \$456,000 (\$381,000 for asbestos removal of 41,500SF of flooring tile; 80 windows with ACM window glazing and caulk; 20 sinks with ACM undercoat; 9,400LF of ACM roofing materials (flashing, coating/sealant); 2,300SF of ACM roof decking/ 150SF of ACM boiler insulation; 48LF of ACM insulation for exterior steam lines; 38LF of ACM transite flues) and (\$75,000 for removal of 1,665SF of lead-paint removal)

**g. Measuring Environmental Results** - To ensure this EPA Brownfield Cleanup Grant is on schedule, the HSAAT's Brownfields Team, which will include the QEP, will meet quarterly to track all outputs identified in 3.b. using an Excel spreadsheet. HSAAT will report progress to the EPA via quarterly reports, and project expenditures and activities will be compared to the project schedule to ensure the project will be completed within the four-year time frame. Site information will be entered and tracked in the ACRES database. Outputs to be tracked include QAPP; ABCA; cleanup plan development; contractor procurement; quarterly, annual, and closeout reports; and the number of community meetings. The outcomes to be tracked include community participation, acres ready for reuse, redevelopment dollars leveraged, and jobs created. In the event the project is not progressing efficiently, countermeasures are in place to address the problem, which include making monthly calls to the EPA Project Officer and, if needed, revising the existing Work Plan to get back on schedule.

#### **(4) PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE**

##### **Programmatic Capability**

a. Organizational Structure/b. Description of Key Staff - HSAAT is led by a Board that is ready to administer and manage brownfield cleanup grant funds when awarded. HSAAT has demonstrated financial capability by raising funds for the purchase of the site. HSAAT is led by **Reverend Charlie Barlow (Chief Executive)**, whose extensive corporate leadership experience includes overseeing corporate multi-million-dollar budgets. Under his direction, HSAAT has successfully acquired the site, secured the removal of deed restrictions, established crucial partnerships with Georgia Tech, Butts County Economic Development Authority, and Amazon's Workforce Development division, and coordinated community events, demonstrating the site's viability as a community asset. Rev. Barlow's community connections have proven invaluable in advancing the HIBCC, and he will continue to provide communication and continuity with the community, as well as residents/groups directly affected by the project work. Board member **Mr. Harvey Norris (Project Director and Property Superintendent)** will serve as the primary contact and be responsible for required reports with the assistance of the selected QEP for the project. Mr. Norris is a retired Jackson Fire Chief and brings critical public safety and hazardous materials expertise, including certifications and experience, to ensure proper oversight of environmental remediation activities, compliance with safety regulations during cleanup, and implementation of building safety improvements identified in our assessment. HSAAT Board

Vice Chair, Ms. **Ella Allen (Project Manager)** will support program management and administrative capacities. As executive director of McIntosh Trail Early Child Early Childhood Development Council, Ms. Allen has deep programmatic and administrative experience, including managing a \$17M budget. HSAAT Board member Dr. **Cassandra Knight (Community Involvement Coordinator)** founded another local nonprofit and serves on several Jackson nonprofit boards. She will be responsible for collaborating with the QEP and Project Director to support HSAAT's strategy for fostering community engagement throughout the term of the cleanup grant.

c. Acquiring Additional Resources - HSAAT will follow the procedures detailed in 2 CFR 200 and EPA's rule at 2 CFR 1500 to procure a QEP to provide support after the grant is awarded. The QEP will assist HSAAT in preparing bid documents needed to select a contractor to conduct the cleanup work and manage the remediation project as it commences. All procurement will follow federal procurement regulations and any other requirements needed for procurement under an EPA Cooperative Agreement. HSAAT, as a not-for-profit organization, has the ability to procure services/contractors that meet the Federal procurement requirements. HSAAT will work with its Project Partners to develop a management plan for taking over the grant project if any person serving the major roles were to leave the project.

### **Past Performance and Accomplishments**

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

#### (1) Purpose and Accomplishments

Although HSAAT has not received funding under a US EPA Brownfields grant, HSAAT has successfully obtained and managed other grant resources. A summary of the most recently completed grant project is provided below.

**New Venture Grant** (\$30,000; Project Period March 2024 – October 2025): This grant funded a capacity-building grant. Funding was used by HSAAT to develop a financial management system, restructure HSSAT organization into a business operation model, website development, and grant writing. The project and closeout reporting were both completed ahead of schedule and within budget. All reporting and project details were submitted on-time and approved as submitted. The project was closed out in October 2025.

#### (2) Compliance with Grant Requirements

HSAAT has a history of timely compliance with grant awards. Staff closely monitor progress toward program goals, milestones and intended outputs and outcomes. Additionally, staff conduct annual audits. No adverse audit findings have been determined. All terms and conditions of the awarding agencies are being met in a timely manner and in accordance with set work plans and schedules. Reports and financials have been submitted in a timely manner to date and applicable grants are closed as detailed above.

## **Threshold Criteria**

### **1. Applicant Eligibility**

HSAAT affirms that it is an eligible entity as a tax-exempt nonprofit corporation organized under section 501(c)3 of the Internal Revenue Code. Our current IRS determination letter is attached.

### **2. Previously Awarded Cleanup Grants**

HSAAT affirms that the site has not previously been awarded an EPA Brownfields Cleanup Grant.

### **3. Expenditure of Existing Multipurpose Grant Funds**

HSAAT does not have an open EPA Brownfields Multipurpose Grant.

### **4. Site Ownership**

HSAAT is the registered owner of the proposed site.

### **5. Basic Site Information**

- a) **Site Name:** Henderson School
- b) **Address:** 820 North Mulberry Street Jackson GA 30233

### **6. Status and History of Contamination at the Site**

The site includes an approximately 20.43-acre tract of land developed with asphalt, vegetation, a gazebo, and five buildings: one 49,886-square-foot school building, one 19,381-square-foot school building, one 8,235-square-foot gymnasium, and two portable classroom buildings. The site operated as a school from 1955 until 2010. Currently, the majority of the subject property buildings are vacant with the exception of one building, which is occupied by a seasonal haunted house.

In 2023, Tetra Tech, on behalf of the U.S. Environmental Protection Agency (EPA), conducted a TBA at the property, consisting of Phase I and II ESAs. In February 2023, Tetra Tech personnel conducted an initial site visit at the property and identified recognized environmental conditions (RECs), visually inspected the site structures, and identified other environmental hazards on the property. These activities fulfilled the site

visit requirements of a Phase I ESA and provided the basis for a Phase II ESA. For more details, see the Phase I Environmental Site Assessment Report, Henderson School Alumni Association (BIL), prepared by Tetra Tech in March 2023 on behalf of the EPA. Upon review of the federal and state database information, Tetra Tech identified the following RECs and/or potential environmental risks (Non-Scope Considerations that did not meet the ASTM definition of a REC):

- Known asbestos-containing materials (ACM) exist in the subject property structures. A previous ACM survey was performed on the subject property that identified various ACM within the buildings.
- Suspected lead-based paint (LBP) was observed on surfaces throughout the subject property buildings.
- Tetra Tech observed fluorescent light bulbs and light ballasts throughout the site buildings. Older fluorescent light ballasts may contain PCBs, and fluorescent light bulbs may contain mercury.
- Tetra Tech observed a backup generator at the rear of the school building. The generator appeared to be out of use. It is unknown how much petroleum remains, if any, in the belly tank or engine oil in the generator.

Based on the results of the initial site visit, EPA concluded that a Phase II ESA was needed. During the week of September 25, 2023, Tetra Tech conducted the Phase II ESA, which included asbestos sampling, a lead-based paint (LBP) screening, and a hazardous materials survey. For full details of the sampling event, see the Phase II Environmental Site Assessment Henderson School Alumni Association (BIL), prepared by Tetra Tech in November 2023. A summary of the Phase II ESA results is as follows:

- Eighteen asbestos containing materials (ACM) samples from eight homogeneous areas contained greater than 1 percent asbestos.
- Nine locations screened for LBP revealed a lead content equal or greater than the EPA standard of 1.0 milligram of lead per square centimeter of substrate.
- Tetra Tech performed a visual survey of hazardous materials and identified potential PCB-containing ballasts and mercury equipment throughout the gym and school buildings

## **7. Brownfield Site Definition**

HSAAT affirms that the site is:

- a) Not listed or proposed for listing on the National Priorities List,
- b) 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
- c) Not subject to the jurisdiction, custody or control of the U.S. government.

## **8. Environmental Assessment Required for Cleanup Grant Applications**

As noted above, in 2023, a Phase I and Phase II was completed at the site. The Phase II ESA for the former Henderson School site was conducted in September 2023 and final report is November 2023. The assessment included asbestos sampling, a lead-based paint (LBP) screening, and a hazardous materials survey.

## **9. Site Characterization**

a) The site is not enrolled in the state voluntary response program because HSAAT has owned the property for more than 30 days pursuant to the Georgia Brownfield Act. Letter from the State Environmental Authority (GA EPD) is attached. The environmental assessments performed to date provide a sufficient level of characterization of the site for the proposed remediation work to begin.

## **10. Enforcement or Other Actions**

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

## **11. Sites Requiring a Property-Specific Determination**

HSAAT affirms the site does not need a Property-Specific Determination.

## **12. Threshold Criteria Related to CERCLAS/Petroleum Liability**

a) Property Ownership Eligibility – Hazardous Substance Sites

iv. Sites with Hazardous Building Material That is Not Released Into the Environment: HSAAT affirms there has been no release and that there is no threat of release of the hazardous substance(s) from building materials into the outdoor environment based on the site conditions.

## **13. Cleanup Authority and Oversight Structure**

a) The cleanup will be overseen by a Georgia Licensed Site Professional (LSP) / Qualified Environmental Professional (QEP) procured by HSAAT to design, monitor, oversee and document the cleanup. These services will be solicited using competitive procurement practices and in accordance with all federal (2 CFR §200.317 through 200.327) and state requirements. HSAAT has established

procedures include seeking statements of qualifications and price. Professionals with previous EPA Brownfields experience will be encouraged to compete. This technical expertise will be in place prior to beginning any cleanup activities. The LSP/QEP will comply with and submit all required state and federal requirements to ensure that the cleanup project protects human health and the environment. The Site will be monitored during cleanup activities to ensure that off-site migration of contaminants does not occur as a result of remedial activities. The LSP/QEP will also develop necessary design and/or institutional control plans, as needed. All reports will be publicly available on the HSAAT website.

- b) This is not needed or applicable for this site, as the site would be stand-alone.

#### **14. Community Notification**

- a) **Draft Analysis of Brownfield Cleanup Alternatives**: HSAAT has provided the community an opportunity to comment on the draft application, which included an attached draft Analysis of Brownfield Cleanup Alternatives (ABCA). HSAAT will finalize the ABCA and make it available for additional public review and comment as a part of our pre-cleanup activities.
- b) **Community Notification Ad**: HSAAT ran an ad in the Jackson Progress newspaper on January 13, 2026, to advertise the community notification. The notification clearly stated that HSAAT's application is available to review, instructions for obtaining HSAAT's application for review and how to comment on the draft application, and the date, time and location of the public meeting. HSAAT also ran an ad on the local radio station, WJGA.
- c) **Public Meeting**: HSAAT held a public meeting on January 18, 2026
- d) to gather comments on the draft ABCA. From the Public Meeting, HSAAT is including the following in their grant application submittal:
- the comments or a summary of the public comments received;
  - the applicant's response to those comments;
  - meeting notes or a summary of the public meeting; and
  - meeting sign-in sheet
- e) **Submission of Community Notification Documents**: Attached is a summary of the public comments received, HSAAT's response to those comments, a summary of the public meeting and a record of the meeting participants. Also attached is a copy of the draft ABCA, the community notification and the documentation from the public meeting.

#### **15. Contractors and Named Subrecipients**

- **Contractor(s)**: HSAAT will select contractors, including consultants, in compliance with the fair and open competition requirements in 2 CFR Part 200, 2 CFR Part 1500 and 40 CFR Part 33. We acknowledge that EPA will not accept sole source

justifications for procurement of contractors for services and that firms or individual consultants that develop or draft specifications, requirements, statements of work, or invitations for bids or requests for proposals must be excluded from competing for such procurements as provided in 2 CFR § 200.319(b). We acknowledge that that for contracts over \$250,000, HSAAT will remain consistent with 2 CFR § 200.320(b)(2)(iii) and include price as an evaluation factor except when acquiring services that can only be provided by a licensed Architectural and Engineering firm as described in 2 CFR § 200.320(b)(2)(iv).

- Named Subrecipients: Not applicable



**Jeffrey W. Cown, Director**

**Land Protection Branch**  
2 Martin Luther King, Jr. Drive  
Suite 1058, East Tower  
Atlanta, Georgia 30334  
404-657-8600

January 21, 2026

VIA ELECTRONIC MAIL: [hendersonrepurpose@gmail.com](mailto:hendersonrepurpose@gmail.com)

Mr. Charlie Barlow  
Henderson School Alumni Association Trust  
PO Box 1607  
Jackson, Georgia 30223

RE: State Acknowledgement Letter – Brownfield Cleanup Grant Application  
Former Henderson School  
820 North Mulberry Street, Jackson, Butts County, Georgia

Dear Mr. Barlow:

This letter serves as acknowledgement from the Georgia Environmental Protection Division (EPD) that Henderson School Alumni Association Trust will be submitting an application to the U.S. Environmental Protection Agency (EPA) for funding assistance under the federal Cleanup Grant. EPD understands that The Henderson School Alumni Association Trust has developed an application requesting site-specific federal Brownfields Cleanup funding for the Former Henderson School located at 820 North Mulberry Street in Jackson, Georgia.

GA EPD affirms that the Henderson School Alumni Association Trust is ineligible to enroll the Former Henderson School into the Georgia Brownfield Program because they have owned the property for more than 30 days pursuant to the Georgia Brownfield Act (Act). Also, a demonstration has not been made that the Former Henderson School meets the qualifying property criteria as enumerated in the Act. However, Former Henderson School may be eligible to participate in Georgia's Voluntary Remediation Program provided the property meets the qualifying criteria enumerated in the Georgia Voluntary Remediation Program Act.

EPD would like to take this opportunity to encourage EPA's positive decision in making a grant award to the Henderson School Alumni Association Trust for this cleanup. A successful award would greatly assist the development corporation in its redevelopment efforts. Thank you for your consideration.

Sincerely,

Adam Otis Hanley  
Brownfield Team Lead