



Port of  
**ARLINGTON**  
Environmental Sentry Corp

**Meeting Notice**

**Thursday, November 2, 2023, at 5:30 pm**  
**Location: Veterans Memorial Hall,**  
**120 S Main St, Condon, OR**

In-Person and Via Zoom

**Topic: EPA Grant Application Meeting, Former Condon Grade School**

Join Zoom Meeting:

<https://us02web.zoom.us/j/85283813665?pwd=OERDbW5wV0VjZC9FOVFGGeVB6NW52dz09>

Meeting ID: 852 8381 3665

Passcode: 518051

**Documents: DRAFT EPA Application, Analysis of Brownfield Cleanup Alternatives (ABCA)**

**Purpose: To receive comments on the Draft Application for EPA's Fiscal Year 2024 Brownfield Cleanup Grant for the clean-up of the former Condon Grade School building.**

**Agenda:**

- 1. Call Meeting to Order and Welcome Attendees** – by Gibb Wilkins, President
- 2. Project Introduction** – by Jed Crowther, Executive Director  
Partnerships, Progress, Participation, Resources
- 3. Project Overview** – by Seth Otto, AICP, LEED AP, Maul Foster & Alongi, Inc.
- 4. EPA Grant Overview**
- 5. Questions and Comments from audience on the grant and abatement**
- 6. Comments on “Community Aspirations” of the Condon Grade School Project**
- 7. Adjournment**

*10 minute break*

*Regular Port Meeting to follow*

Join Zoom Meeting

<https://us02web.zoom.us/j/9537854875>

Meeting ID: 953 785 4875

+16699006833,,85648511236# US (San Jose)

+12532158782,,85648511236# US (Tacoma)

**Regular Commission Meeting Agenda**

**Thursday, November 2, 2023**

- 1. Call Meeting to Order**
- 2. Public Comment on Non-Agenda Items**
- 3. Consent Agenda:**
  - a. Approve Regular Meeting Minutes for October 12, 2023
  - b. Approve October 2023 Accounts Payable and Financials
- 4. Director Report**
- 5. President Report**
- 6. Commissioner Reports**
- 7. Executive Session, ORS 192.660(2)(e):** To conduct deliberations with the persons designated by governing body to negotiate real property transactions.
- 8. Decision or deliberations on Real Estate Transactions (Placeholder).**
- 9. Adjourn Meeting**

Please request accommodations in advance for limited English proficiency or with a disability.

**PORT OF ARLINGTON ENVIRONMENTAL SENTRY CORPORATION IS HOLDING A  
PUBLIC MEETING ON THE CONDON GRADE SCHOOL CLEANUP**

THE PURPOSE OF THIS MEETING IS TO RECEIVE COMMENTS ON THE DRAFT APPLICATION FOR EPA'S FISCAL YEAR 2024 BROWNFIELD CLEANUP GRANT FOR THE CLEAN-UP OF THE FORMER CONDON GRADE SCHOOL BUILDING.

COMMENTS CAN BE MADE AT THE MEETING IN PERSON OR BY ZOOM, PLUS WILL ACCEPT WRITTEN COMMENTS DELIVERED BY EMAIL TO KATHRYN GREINER AT [ADMIN@CITYOFCONDON.COM](mailto:ADMIN@CITYOFCONDON.COM) & JED CROWTHER [JED.CROWTHER@PORTOFARLINGTON.COM](mailto:JED.CROWTHER@PORTOFARLINGTON.COM) ; OR DROP OFF AT CONDON CITY HALL, 128 S. MAIN STREET, CONDON.

DRAFT EPA APPLICATION AND ANALYSIS OF BROWNFIELD ALTERNATIVES WILL BE AVAILABLE MONDAY, OCTOBER 30, 2023 ON THE FOLLOWING WEBSITES [WWW.CITYOFCONDON.COM](http://WWW.CITYOFCONDON.COM) AND [WWW.PORTOFARLINGTON.COM](http://WWW.PORTOFARLINGTON.COM)

IF YOU KNOW OF A COMMUNITY MEMBER WITH LIMITED ENGLISH PROFICIENCY OR WITH A DISABILITY WHO MAY BE INTERESTED IN PROVIDING COMMENT ON THIS APPLICATION, PLEASE CONTACT KATHRYN GREINER AT 541-384-2711 AS SOON AS POSSIBLE, BUT NO LATER THAN OCTOBER 31, 2023 FOR ACCOMMODATIONS.

IF YOU HAVE ANY QUESTIONS, PLEASE CONTACT JED CROWTHER, EXECUTIVE DIRECTOR PORT OF ARLINGTON 541-705-2004 OR KATHRYN GREINER, CITY ADMINISTRATOR CITY OF CONDON 541-384-2711

**Thursday, November 2, 2023 at 5:30 PM**  
**Veterans Memorial Hall · 120 S Main St, Condon**

**Join Zoom Meeting:**  
<https://us02web.zoom.us/j/85283813665pwd=OERDbW5wV0VjZC9FOVFGeVB6NW52dz09>

**Meeting ID: 852 8381 3665 Passcode: 518051**

## 1. Project Area Description and Plans for Revitalization

### a. Target Area and Brownfields, i. Overview of Brownfield Challenges and Description of Target Area

The Port of Arlington Environmental Sentry Corp (Sentry Corp), an Oregon nonprofit corporation, requests \$500,000 for a U.S. Environmental Protection Agency (EPA) Brownfields Cleanup Program grant to remediate a contaminated, former elementary school (the Condon Grade School) located in Condon, census tract 9601, Oregon in Gilliam County. Condon, historically a farming and ranching community, is a small city (0.83 square miles) located in north-central Oregon approximately 150 miles east of Portland and 38 miles south of the Columbia River. The Target Area is the neighborhood of Condon with a population of less than 1,000 people. The area has high rates of poverty, disability, and unemployment. The former Condon School is contaminated with hazardous building materials (HBM) that have the potential to cause long-term human health and environmental issues. These contaminants will need to be addressed before reuse/redevelopment of the Property can occur. This is important because the community is in dire need of affordable housing and additional buildable lands, which the Property could provide. The remoteness of Condon combined with its small population and high poverty rates, makes addressing this brownfield site almost impossible for the community. Additionally, this property is one of 20 active potential cleanup sites in the 0.83-square mile area of Condon.

### ii. Description of the Proposed Brownfield Site

The proposed brownfield site, the Condon Grade School, is located east of downtown at 220 South East Street, Condon, Oregon, 97823. It comprises approximately 3.16 acres on Gilliam County map and tax lots 04S21E10DB-01400 and 04S21E10DB-01500. According to Gilliam County, the site is currently zoned Public Facility. A two-story school building is located on the western portion of the site and a fenced-in playground and grassy field are on the eastern portion. The school building is approximately 45,300 square feet in size and includes a covered and heated recreation area on the east side of the building, referred to as the play shed. The school building was constructed in the early 1920s; the play shed addition was constructed in 1955, the two wings of classroom additions (on the north and south ends of the building) were constructed in 1958, a locker room extension was added to the play shed in 1964, and the library was added in 1966. The site was used as a school for over 100 years and has been vacant since 2022, when the Condon School District constructed and relocated students to a new school. The Condon School District deeded the school property to the City of Condon (the City) in 2020. In 2023, the Property was deeded from the City to the Sentry Corp. A Phase I Environmental Site Assessment of the Property was prepared in accordance with ASTM 1527-21 standards prior to the transference of the Property to the Sentry Corp.

The buildings at the site contain known asbestos-containing materials (ACM), lead-based paint (LBP), and other HBM (e.g., mercury-containing thermostats and lighting fixtures, polychlorinated biphenyls [PCBs]), identified in two Phase I environmental site assessments (ESAs) (MFA 2021, 2023) and a Hazardous Building Material Survey Report (MFA 2022, updated 2023). The HBM identified at the Property must be addressed to allow for productive reuse of the Property and to prevent or limit potential exposure of current and future Property users, workers, and ecological receptors to hazardous substances.

### b. Revitalization of the Target Area, i. Reuse Strategy and Alignment with Revitalization Plans

The reuse strategy will be centered around mixed income housing and workforce housing; this aligns with and advances two main plans—the Rural Development Initiatives “Condon Can!” plan, and the Comprehensive Economic Development Strategy (CEDS) from the Greater Eastern Oregon Development Corporation, describe in Table 1. The “Condon Can!” plan is still in the process of being developed, but it is specifically focused on creating a vision plan for Condon 2050, that will include goals of housing, economic development, and community health. This plan is being developed in conjunction with the former Condon Grade School project. The goals and projected outcomes of the project are in alignment with the priorities listed in the CEDS, specifically in relation to building workforce housing and grant attainment. The reuse strategy aligns with and advances the City’s revitalization plans that are currently in the process of being fully developed. The Property is not in a flood plain.

**Table 1. Reuse Strategy’s Alignment with Revitalization Plans**

Entity	Plan	How Project Relates
Rural Development Initiatives	<i>Condon Can!</i>	This project will create a visioning plan for Condon 2050 and will focus on rural development and revitalization.
Greater Eastern Oregon Development Corporation	<u><a href="#">Comprehensive Economic Development Strategy</a></u>	The 2014 – 2019 Comprehensive Economic Development Strategy (CEDS) is intended help guide economic development in the 7-county region of Gilliam, Morrow, Umatilla, Wheeler, Grant, Harney and Malheur counties. It includes goals of

workforce housing and grant attainment. From community surveys, a vacant building assessment in the Condon School District was also identified as a priority—which directly relates to the Condon Grade School.

City of Condon	<i>Comprehensive Plan</i>	The City’s Comprehensive Plan includes goals of increasing housing stock through a variety of different needed housing types.
Condon City Council	<i>Condon Goals and Priorities*</i>	Relevant goals include working with the Sentry Corp to develop the Condon Grade School; and investigate funding sources to develop buildable lots for housing.

\*The Condon Goals and Priorities are not a revitalization plan, but they specifically represent and reference the current needs of the city.

**ii. Outcomes and Benefits of Reuse Strategy**

The plan for the Property will aim to examine a variety of community-oriented alternatives, with a focus on mixed income housing. The primary goal of the cleanup is first to contain and eliminate the human health and environmental risks that are associated with the present contamination. Cleanup and adaptive reuse of the Condon Grade Elementary School will help to build affordable, healthy, and adequate housing, which is sorely lacking; decrease risks of environmental contamination and human health impacts; and help to build community resources. The project will not cause any displacement or negatively impact priority populations.

Cleanup of this site would decrease the number of brownfield sites in such a small community. These efforts will result in the reduction of environmental risks to the community and will make the site accessible for multiple types of reuse or redevelopment, if affordable housing is deemed unfeasible. Currently, the primary goal is to determine if the school building itself could be renovated to be affordable housing, with classrooms being turned into individual apartments. Alternatively, if the school building is deemed to be unusable for housing, the Property itself could still be sited for it pending demolition. The size, location, and utility access of the Property create a prime opportunity for mixed income housing, especially as the developable lands in Condon are lacking. Affordable housing is a necessary community asset that directly impacts personal and community health. Increasing the housing stock (affordable and market) in a city such as Condon is fundamental to the ongoing development of the community. It will allow those already suffering from the impacts of poverty to not be further impacted by inadequate housing; it will also provide opportunities for those moving to Condon. Condon has some of the oldest housing stock in all of Oregon, with most houses being built before 1939 (Allen, 2021). 43% of all homes in Condon were built before World War II, in comparison to Oregon as a whole which is only 11%, and the nation which is only 13%. On top of this, the vacancy rate is estimated to be around 20% (Bestneighborhood, 2021). This combination of old homes and high vacancy means that the community is plagued by old and dilapidated homes that are often unsafe or need work to live in. However, the Covid pandemic changed the economy and many who used to live in rural areas or the suburbs are indicating a desire to move back as the work from home movement has grown. This opened a door in Condon as families are interested in moving back and working from home, however the current housing stock can not accommodate this.

Additionally, showcasing the City as an attractive place for new—and especially younger populations to move to is an important step for building a successful future and economy. This reuse strategy is especially important as the City would not have the funding to create these opportunities otherwise, leaving gaps in housing availability and affordability.

**c. Strategy for Leveraging Resources**

**i.–iii. Resources Needed for Site Characterization/Remediation/Reuse (1.c.i through 1.c.iii)**

Table 2. Potential Resources for Reuse			
Name of Resource	Assessment, Remediation, or Reuse Activities?	Secured or Unsecured?	Additional Details or Information
Business Oregon Rural Opportunity Initiative	1.c.iii. Reuse	Unsecured	Develop a strategy, gather partners, develop tactics, and coordinate resources to fully occupy the redeveloped Property and position Condon as a gateway to central Oregon attractions. (Two additional phases of funding, Launch and Scale, are available under this opportunity.)

Business Oregon Port Planning and Marketing Fund	1.c.iii. Reuse	Unsecured	Conducting a market study to assess regional needs and opportunities, strengthen local and regional partnerships, resulting in a strategic business plan for the redeveloped facility.
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#### iv. Use of Existing Infrastructure

A primary goal of this project is to assess whether the Property can be used for affordable housing development and whether the school building itself can be retained for this use. Retaining the building to create housing is preferable and will be prioritized if possible. Assuming this is the case, most existing utility infrastructure (electrical, water, sewer, etc.) will be retained to feed the new use. Updates will be needed for utilities, namely heating which will need to be transitioned from oil to electric, or another form.

## 2. Community Need and Community Engagement

### a. Community Need, i. The Community's Need for Funding

The City of Condon is a small (population 763), low income community. It is considered distressed by the State of Oregon, which is determined by assessing economic characteristics such as poverty, per capita income, and employment rate. In Condon, the economic distress is clear with a poverty rate of 18.2%, and per capita income rate of \$25,288. The community also has a low employment rate (32.4%) compared to almost 60% for the state. Much of the City's recent project funding has come from a variety of statewide and county-level grants, as the tax base alone is not enough to support municipal improvements and projects. With a tax base of only \$250,000 per year, grant money is necessary for the City to complete any planning projects or brownfield cleanups. The U.S. Environmental Protection Agency (EPA) Brownfield grant would enable this community to clean up a site that is currently posing a threat to human health and the environment. Redeveloping the former Condon Grade School has the potential to create affordable housing and redeveloped commercial spaces that would prove attractive to business looking to expand into this location that is a gateway into the natural beauty of central Oregon. Additionally, as stated before, there are multiple potential cleanup sites in Gilliam County and Condon. Yet, out of all the identified potential cleanup sites in the County, more than half are located in Condon and the City is financially unable to address them. It is possible that there are additional contaminants that are impacting communities and neighborhoods that are not represented in the data. The ability to address just one of these sites has the potential to benefit the community.

**Table 3. Economic Distress Data**

Indicator	Target Area	Gilliam County	Oregon	U.S.
Population (2021)	763	1,954	4,207,177	329,725,481
Population Change Since 2010	+133	+223	+445,252	+23,121,709
Median Household Income	\$35,000	\$51,705	\$65,667	\$69,021
Annual per Capita Income	\$25,288	\$30,182	\$37,816	\$37,638
Below Poverty Level	18.2%	11.8%	12.1%	12.6%
2020 Unemployment Rate	8.2%	5.7%	5.5%	5.4%

#### Notes

Shading indicates disparities compared to the City of Eugene, Lane County, Oregon, or the U.S.

Data Source: U.S. Census 2020 American Community Survey 5-year estimates (2016–2020).

\*Target area totals are for population, all other variables show averages unless noted (i.e., Median Household Income).

### ii. Threats to Sensitive Populations, (1) Health or Welfare of Sensitive Populations

The City has a particularly high proportion of elderly individuals, high poverty rates, and lower median incomes (Tables 3 and 4). Vulnerable and sensitive individuals make up a significant portion of the population; almost 50% of residents are over 65 and 19.2% of those live in poverty. This small community is aging and has a high rate of disabled individuals (20%), nearly twice the rate of disability in the country.

**Table 4. Identifying Sensitive Populations**

Indicator	Target Area	Gilliam County	Oregon	U.S.
Minority population	13%	13%	24%	39%

Hispanic residents	5.9%	5%	13.8%	18.2%
Age over 65	49.9%	29.9%	17.6%	16.0%
Age over 65 below poverty	19.2%	13.1%	8.5%	9.6%
Age under 5	2.2%	2.0%	5.3%	6.0%
Age under 18	7.6%	17.2%	20.8%	22.5%
Women 15–44 years (% female population)	18.6%	24.8%	39.2%	38.8%
Disability	20.6%	16.2%	14.4%	12.6%

**Table 5. EJ Screen Data**

Indicator	Percentile	
	State	U.S.
Diesel Particulate Matter	10	4
Ozone	83	12
Lead Paint	85	75
RMP Facility Proximity	84	77
Demographic Index	27%	35%
People of Color	24%	39%
Unemployment Rate	6%	6%
Low Income	29%	31%
Less than H.S. Education	9%	12%
Low Life Expectancy	19%	20%

**Notes**

Shading indicates data is above 70<sup>th</sup> percentile.  
 cRMP Facility = a facility that has submitted a risk management plan to the U.S. Environmental Protection Agency.

**(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions**

Table 5 shows elevated levels of pollutants and socioeconomic indicators that disproportionately impact the residents of Condon. In comparison to the state, Condon has greater exposure to ozone, lead paint, and has greater proximity to RMP facilities. Ozone and lead paint are associated with a variety of health impacts in humans; exposure to lead paint is associated with high blood pressure, nerve disorders, reproductive issues, memory problems, and muscle and joint pain. Those who are in close proximity to RMP facilities are most at risk for exposure if there is an accidental chemical release. It is possible that there are additional contaminants impacting communities and neighborhoods that are not represented in the data.

Table 6 shows an elevated cancer rate for Condon. Relative to the country and state, the residents of the area are experiencing a higher burden of cancer related disease. Compared to both the US and Oregon, Condon residents are also impacted by elevated rates of heart disease and there is a higher number of people with disabilities. The Centers for Disease Control's [PLACES Health Data](#) show that risk of stroke is a significant factor that impacts residents; the estimated prevalence of stroke is 4.9, 36% greater than the national average of 3.4. These health burdens may be associated with exposure to hazardous substances and lack of resources. This grant and related cleanup strategy will reduce exposure risks to the people in the City.

Measure	Health Value		
	Target Area	Oregon	US
Low Life Expectancy	17%	19%	20%
Cancer	8.7	6.6	6.1
Heart Disease	8.6	5.9	6.1
Persons with Disabilities	20.6%	14.9%	13.4%

### (3) Promoting Environmental Justice, a. Identification of Environmental Justice Issues

The small, rural community of Condon is economically struggling, aging, and overburdened by poverty. As captured by the tables above, the community is distressed by environmental factors and exposure to pollutants. The community is also aging, and the number of children is relatively low (7.6% under 18), without young people entering the workforce the already small tax base will shrink even further. This is already a problem with the City having to fight for grant funding to complete even the smallest of municipal projects such as partial sidewalk repairs. The City is struggling to leverage additional types of economic activity that could increase their tax base, such as tourism/recreation activities, business expansion, and new business entries. This is not due to lack of opportunity or assets, but rather lack of funding and healthy, affordable housing. According to a 2019 economic opportunity analysis for the City of Condon, the City has several assets and locational advantages that could provide opportunities for tourism or to expand existing businesses. These include the historic downtown, the golf course, and the fact that Condon serves as a gateway to multiple state parks, the John Day Fossil Beds, and the John Day River. . A lack of affordable residential and workforce housing in the City is a major hindrance to capitalizing off of these opportunities. There is a desire to determine if this property could help provide a solution by providing affordable housing. Directing grant benefits to this economically and environmentally burdened community can result in the revitalization of the identified brownfield site. This would provide direct benefits to this impoverished and sensitive community by reducing contamination and facilitating alternative development. Redevelopment of this site could provide increased affordable housing and community facilities, which may in turn encourage further economic development by providing adequate space for new business owners and employees.

### b. Community Engagement, i.–ii. Project Involvement and Project Roles (2.b.i through ii)

Table 8. Project Involvement and Project Roles

Name of Organization/Entity/Group	Point of Contact	Specific Project Role or Assistance Provided
Gilliam County	Judge Elizabeth Farrar Campbell	Current and possibly future funding assistance such as gap funding, Potential decision-making power.
City of Condon	Kathryn Greiner, City Administrator	Working partner in planning, finances, and management of infrastructure post cleanup.
Condon School District	Superintendent Bryan Schimel	N/A. Supporting stakeholder.
Oregon Frontier Chamber of Commerce	Brooklyn Griffith	N/A. Supporting stakeholder.
Summit Springs Village	David Greiner	Supporting stakeholder; potentially interested in workforce housing for staff. Potential decision-making power for reuse.

### iii. Incorporating Community Input

The Sentry Corp and City of Condon will share copies of this EPA grant application and the Analysis of Brownfields Cleanup Alternatives (ABCA) with the community and project partners to solicit input on the proposed cleanup project. This community meeting took place on November 2nd, 2023 and xx people attended. Notice of this meeting was added to the City of Condon newspaper and sent out to identified stakeholders. Community feedback indicated.....\*placeholder for feedback\*.

Sentry Corp will develop a public involvement plan (PIP) upon award notification and will work with the City of Condon to connect with stakeholders. The PIP will inform outreach activities and ensure that the community receives information on the cleanup and reuse strategy. Sentry Corp, the Port of Arlington, and the City of Condon will hold regular community meetings to inform stakeholders of progress, as well as semiannual reporting sessions. Sentry Corp will collect attendance at each meeting, record public comment, and consider them when implementing the cleanup plan. They will also transparently report and share the meeting feedback online or via email.

## 3. Task Descriptions, Cost Estimates, and Measuring Progress

### a. Proposed Cleanup Plan

The Sentry Corp will use the grant funds for the abatement of HBM materials from the former Condon Grade School buildings. The procured abatement contractor's cleanup activities will include abating and

disposing of the HBM (e.g., materials containing asbestos, lead, mercury-containing thermostats and light fixtures) as well as any additional HBM that are discovered during abatement activities. MFA's Hazardous Building Materials Survey Report (MFA, 2022, update 2023) identified over 24,000 square feet of asbestos-containing flooring, 9,000 square feet of asbestos-containing stucco siding, 10,000 square feet of asbestos-containing HVAC duct insulation tape, as well as other asbestos-containing, lead-containing, and mercury-containing building materials that will require abatement and disposal.

The preferred remedial action would remove all contaminated soil from the Property, limited by the building footprint slab/foundation stem wall, and implement full HBM abatement to prevent exposure of human receptors to the hazardous substances contained in the HBM. The preferred remedial action includes the following:

**Removal of all existing ACM and miscellaneous hazardous substances**, including removal of all ACM, LBP, PCB-containing fixtures, and mercury-containing fixtures prior to renovation. Abatement of flooring (tile, vinyl, linoleum, and mastic), thermal systems insulation, leveling compound, and exterior stucco as well as all PCB and mercury-containing light bulbs, fixtures, and flooring. Disposal of all HBM at the Columbia Ridge Landfill. LBP will be encapsulated.

## b. Description of Tasks, Activities, and Outputs

### i-iv. Project Implementation, Anticipated Project Schedule, Task/Activity Lead, Outputs (3.b.i - 3.b.iv)

**Table 9. Tasks and Activities**

#### **Task 1 – Project Management**

- i. The Sentry Corp will be responsible for overall project execution and management. The Sentry Corp will manage project tasks, monitor schedule and budget in coordination with City of Condon, report on project activities and accomplishments to stakeholders, and procure and oversee the qualified environmental professional (QEP), which will support reporting and develop a Final Closeout Report to document all project activities. The Sentry Corp, City and other team members will meet monthly. Two Sentry Corp staff members will attend 1 national brownfields conference and 2 state or regional conferences.
- ii. Anticipated Project Schedule: QEP to be procured June-July 2024; remaining work will take place October 1, 2024, to April 30, 2028.
- iii. Lead: The Sentry Corp, Assist: City of Condon, QEP
- iv. Outputs: 18 project team meetings, 6 Quarterly Reports, 2 DBE Reports, 2 Federal Financial Reports, 1 Final Cleanup Report, attendance at 1 national brownfields conference, attendance at 1 state or regional brownfields conferences, 6 quarterly ACRES updates.

#### **Task 2 – Community Outreach**

- i. The Sentry Corp will work closely with area residents, project partners, and other stakeholders throughout the project. The Sentry Corp will develop a public involvement plan and conduct 3 community meetings at key project milestones (before, during, after); conduct direct outreach to impacted neighbors, especially underserved communities; establish a website and online information repository; and communicate project information through newspapers, newsletters, social media, email, and website. The QEP will support the Sentry Corp with community meetings, articles/press, and direct outreach. Community meetings and outreach will continue beyond completion of cleanup to provide additional opportunities for engagement.
- ii. Schedule: October 1, 2024, to September 30, 2027, with key public meetings in October 2024, July 2024 (during cleanup), and October 2024. Other meetings as needed.
- iii. Lead: The Sentry Corp, Assist: City of Condon, QEP
- iv. Outputs: 1 PIP, 3 community meetings and notes/attendance/recordings, website and online information repository, 4 press releases or newspaper/web articles and social media posts, and direct community outreach as needed.

#### **Task 3 – Cleanup Planning**

- i. Activities include finalizing the Analysis of Brownfields Cleanup Alternatives (ABCA) and obtaining approval from the EPA Project Manager; holding an ABCA 30-day public review and comment period; preparing a work plan for abatement, a quality assurance project plan (QAPP), a health and safety plan (HASp), and sampling and analysis plan (SAP); plan negotiations and



receiving regulatory approvals and completing 100% design documents; preparing bid documents for soliciting cleanup contractors; and providing bidding process support.

ii. Schedule: October 1, 2024, to July, 2025.

iii. Lead: The Sentry Corp, Assist: City of Condon, QEP

iv. Outputs: 1 ABCA, 1 work plan, 1 HASP, 1 QAPP, 1 SAP 100% design documents, 1 set of bid documents.

**Task 4 – Site Cleanup**

- The Sentry Corp will use the majority of grant funds for site cleanup. It will competitively procure a remediation contractor in compliance with state regulations and 2 Code of Federal Regulations 200.317-326, which the Sentry Corp Project Manager will oversee with QEP assistance. Contractor cleanup activities will include abatement of HBM. QEP will work with the Sentry Corp to ensure cleanup meets state and City regulations.

i. Schedule: June 1, 2024, to April 30, 2025.

ii. Lead: The Sentry Corp, Assist: City of Condon, QEP

iii. Outputs: 1 certificate of completion.

c. Cost Estimates

Table 10. Project Budget	Project Tasks				Total
	1. Project Management	2. Community Outreach	3. Cleanup Planning	4. Site Cleanup	
<b>Direct Costs</b>					
<b>Personnel</b>	--	--	--	--	--
<b>Fringe Benefits</b>	--	--	--	--	--
<b>Travel</b>	\$6,180	--	--	--	\$6,180
<b>Equipment</b>	--	--	--	--	--
<b>Supplies</b>	--	--	--	--	--
<b>Contractual</b>	\$7,800	\$15,750	\$33,750	\$711,950	\$769,250
<b>Construction</b>	--	--	--	--	--
<b>Other</b>	--	--	--	--	--
<b>Total Direct Costs</b>	<b>\$13,980</b>	<b>\$15,750</b>	<b>\$33,750</b>	<b>\$711,950</b>	<b>\$775,430</b>
<b>Total Indirect Costs</b>	--	--	--	--	--
<b>Total Budget</b>	<b>\$13,980</b>	<b>\$15,750</b>	<b>\$33,750</b>	<b>\$711,950</b>	<b>\$775,430</b>

Note — = no costs in category.

**Table 41. Development of Cost Estimates**

Task	Cost Basis and Assumptions
1. Project Management	<p><u>Travel Costs for Sentry Corp staff: \$6,180</u>                      National brownfields conference (1 conference × 2 people × \$1,305/person = \$5,220)                      Regional/state brownfields conferences (2 conferences × 2 people × \$240/person = \$960)</p> <p><u>Contractual Costs: \$5,100</u>                      18 project team meetings (18 × \$150/hr × 1 hr = \$2,700)                      6 quarterly reports (15 × \$150/hr × 2 hrs = \$1,800); 2 DBE and FFR reports (2 × \$150/hr × 2 hr = \$600)                      1 final summary report (12 hrs × \$150/hr = \$1,800); Quarterly Assessment, Cleanup and Redevelopment Exchange (ACRES) updates (6 × \$150/hr × 1 hr = \$900)</p>

2. Community Outreach	<u>Contractual Costs: \$15,750</u> Public Involvement Plan (12 hrs × \$150/hr = \$1,800); Community outreach meetings (3 × \$150/hr × 8 hrs = \$3,600); Articles/media updates (6 × \$150/hr × 1.5 hrs = \$1,350); Direct outreach and engagement with impacted neighboring underserved communities (20 hrs × \$150/hr = \$7,500); Website updates (15 hrs × \$150/hr = \$2,400); Interpretation and translation (20 hrs × \$150/hr = \$3,600);
3. Cleanup Planning	<u>Contractual Costs: \$33,750</u> Develop remedial action workplan, including coordination for agency review and incorporating comments (55 hrs × \$150/hr = \$8,250); HASP (10 hrs × \$150/hr = \$1,500); QAPP (60 hrs × \$150/hr = \$9,000); Complete remedial action plans and specifications (60 hrs × \$150/hr = \$9,000); Develop bid documents for site cleanup activities, communicate with potential contractors, evaluate bids, call references, coordinate pre-bid onsite meeting, and select contractors (40 hrs × \$150/hr = \$6,000)
4. Site Cleanup	<u>Contractual Costs: \$712,000</u> Abatement contractor (cost estimate of \$653,000); Oversight of abatement contractor by QEP (333 hrs × \$150/hr = \$50,000); Prepare 1 Final Project Closeout Report (60 hrs × \$150/hr = \$9,000)
<b>Notes</b> hr = hour QAPP = quality assurance project plan	QEP = qualified environmental professional Sentry Corp = Port of Arlington Environmental Sentry Corp SF = square foot

#### d. Plan to Measure and Evaluate Environmental Progress and Results

A remedial action work plan with a detailed schedule of milestones and actions, prepared for the cleanup, will be prepared to describe the approach and methods that will be used to abate HBM at the Property. This work plan will give descriptions of the project, project organization and responsibilities of key project staff and contractors, remedial action objectives, remedial action activities, record and reporting requirements. The work plan will also include a HASP and an SAP/QAPP. The work plan and SAP/QAPP will include quality assurance and sampling protocols for the abatement contractor and oversight contractor (i.e., the QEP) to adhere to during abatement, such as perimeter and clearance air monitoring.

**Perimeter and Clearance Air Monitoring:** To monitor the effectiveness of work practices and the safety of workers and bystanders during abatement, the oversight contractor will conduct perimeter and clearance air monitoring during abatement activities to characterize the exposure potential for workers and potential bystanders. To assess the effectiveness of the high-efficiency, particulate air filtered, negative air exhaust system used by the abatement contractor to contain the indoor abatement activities, oversight contractor will also sample the post-filter exhaust air on the first day of indoor abatement.

**Dripline Area Surface Soil Sampling:** Before and after abatement, composite surface soil samples will be collected from the dripline/foundation area (i.e., within three feet of the school building) to establish baseline metals concentrations in surface soils at the Property. The sampling will be conducted in accordance with the U.S. Department of Housing and Urban Development Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing (HUD 2012).

**Guidance for sampling of additional suspect HBM encountered during abatement, including sampling for creating waste profiles for disposal.**

## **Programmatic Capability and Past Performance**

### **a. Programmatic Capability, i. Organizational Structure, ii. Description of Key Staff**

The cleanup grant will be administered by the Sentry Corp with implementation support from the procured environmental contractor/consultant and the City of Condon. Both Sentry Corp and the City of Condon are experienced in grant administration and are familiar with the procedures needed to successfully expend EPA funds in a timely and accurate manner. This includes technical, administrative, financial, reporting, and management requirements. Sentry Corp will manage the daily grant activities, plan and implement cleanup activities, lead community engagement, and contract and manage QEP. Upon receiving the grant award, Sentry Corp may opt to hire an additional outside contractor to assist with financial management and reporting to the EPA; if they do not opt to do so, they will also be in charge of this portion. The City of Condon will assist in day-to-day management and community engagement efforts. Key grant staff are Project Manager Jed Crowther, the Executive Director of Sentry Corp. Jed has almost 20 years of experience in grant management and will be in charge of grant management, including reporting and coordinating with the City and QEP; supervising the QEP and contractor; and supervising outreach. He will coordinate closely with the City and Kayla Rayburn, the Sentry Corp Budget Officer and Administrative Assistant. Kayla will be responsible for budget preparation; developing reimbursement requests; hosting board meetings and other outreach events, compiling feedback; and ensuring compliance with reporting and financial requirements. She has in depth experience with Sentry Corp activities and financials. .

### **Acquiring Additional Resources**

The Sentry Corp has efficient and EPA-compliant procurement processes in place that can be utilized in the event that additional resources are needed.

### **b. Past Performance and Accomplishments**

#### **ii. Has Not Received an EPA Brownfields Grant but Has Received Other Federal or Nonfederal Assistance Agreements**

##### **(1) Purpose and Accomplishments**

Sentry Corp has successfully managed four grants since 2022 and managed the brownfield cleanup of a former Air Station in 2012. They have successfully received over \$120,000 in funding in the last year and are adept in brownfield sites and community-oriented projects.

##### **(2) Compliance with Grant Requirements**

Within the past year, Sentry Corp has successfully managed, drawn down, and complied with the terms and conditions, and schedules of over \$120,000 of County and Statewide funding. Sentry Corp has submitted all quarterly and other required reports in a timely manner and is on track to complete these grants on schedule, following all rules and regulations.



# DIRECTOR REPORT

November 1, 2023

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## ENVIRONMENTAL SENTRY CORP

Materials are attached which describe the aim to pursue brownfield cleanup grants for the former Condon Grade School. We appreciate the community partnerships and public participation, together with available state and federal resources, that will help to make this project a reality.

## PORT OF ARLINGTON

### Brief Outline:

- 1. Strategic Business Plan**  
Completion Letter received from Business Oregon.
- 2. Upcoming Condon Airport Meeting Tour**  
State Aviation officials will meet with local proponents to discuss fuel/water improvements.
- 3. Condon Vision 2050**  
Condon is performing outreach with Rural Development Initiatives (RDI) to create vision.

### Next Meeting

Thurs, Dec 14th at 5 pm at Port of Arlington Office, 100 Port Island Road, in Arlington.



October 26, 2023

Leah Shannon, Port Board President  
Port of Arlington  
PO Box 279  
Arlington, OR 97812

RE: Monitoring of the Port Planning & Marketing Fund, Strategic Business Plan, Project  
Number 521898

Dear Leah Shannon:

On October 19<sup>th</sup>, I conducted a review of legal, financial, and other documents related to the project.

The review indicates that the project is being administered in compliance with the contract, will be completed in a timely fashion, and will fulfill the objectives stated in the contract.

The Regional Development Officer and Regional Project Manager will work with the Port to identify potential opportunities for funding projects identified in the CIP.

Please contact me at 541-297-3682 if you have questions or need further assistance.

Sincerely,

A handwritten signature in black ink that reads 'Becky'.

Becky Bryant, Regional Project Manager  
Business Oregon

c: Jed Crowther, Executive Director  
Ryan DeGrofft, Regional Development Officer

# CONDON CAN!

## *Kick-Off Event*



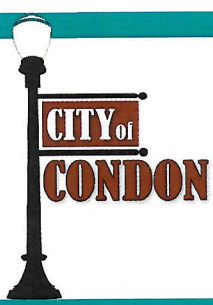
You are invited as we work towards developing a vision statement and ten-year plan for the City of Condon. At this informational meeting, we'll review the project goals, timeline, process, identify project partners, and assess our community.

**Monday, October 9, 4:00–7:00 pm**  
**Veterans Memorial Hall, 120 S Main, Condon**

*Dinner  
will be  
provided!*

Please RSVP by October 6: Kathryn Greiner, City Administrator  
541-384-2711 | [admin@cityofcondon.com](mailto:admin@cityofcondon.com)





# COMMUNITY VISIONING

## City of Condon

Rural Development Initiatives will work with the City of Condon to engage the community in a visioning process. The outcomes will be a vision statement for 2050 and a ten-year action plan.

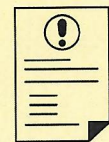
### KICK OFF: SEPTEMBER - OCTOBER

- Meetings to Clarify Goals, Outcomes, Timeline, Scope, and Identify Stakeholders
- Form a Home Team



### PREPARATION: OCTOBER-NOVEMBER

- Craft Survey
- Design Marketing Materials and Outreach Plan



### INTERVIEWS & FOCUS GROUPS: NOVEMBER

- 4 In-Person Focus Groups
- Up to 8 1:1 Interviews with Key Stakeholders



### LAUNCH SURVEY: JANUARY

- Launch 1st Survey: Broad Goals, Values, and Vision for Future
- Synthesize Results from Survey and Focus Groups



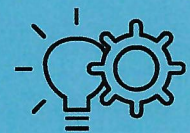
### COMMUNITY ASPIRATION EVENT: MARCH

- 3-Hour In-Person Community Aspiration Event
- Draft Vision Statement, Values, Goals



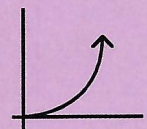
### PRIORITIZATION: APRIL

- Refine Vision Statement
- Design 2nd Survey: Identify Priorities, Assess Interest



### GOAL SETTING: MAY

- In-Person Workshop
- Finalize Vision and Values Statement, Goals, Action Plan



### FINAL VISION: JUNE

- Final Vision Report

