



Lawrence J. Morrissey
Mayor
Office of the Mayor

November 28, 2011

Mr. Don West
Environmental Management Support, Inc.
8601 Georgia Avenue, Suite 500
Silver Spring, MD 20910

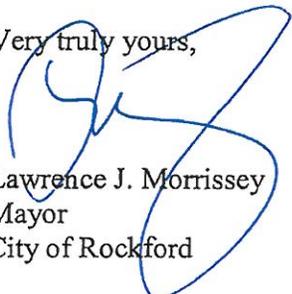
Ms. Deborah Orr
EPA Region V
77 West Jackson Boulevard
Mail Code SE-4J
Chicago, IL 60604-3507

Dear Mr. West and Ms. Orr:

The City of Rockford, Illinois, is pleased to submit our application to the USEPA for a \$ 200,000 Cleanup Grant for the former Tapco Site located at 502 South Main Street. This property is City-owned and includes a vacant, 125,000 square foot, six story manufacturing building that has been vacant and deteriorating for several years. The Tapco Site is located within an economically distressed area of the City adjacent to Davis Park and very near the Rock River which are two major community assets. The City has conducted site assessment activities and has found contaminated soil under the east half of the Tapco building. These soil contaminants are potentially migratory towards the adjacent Davis Park and the Rock River, only 250 feet away. Because the Tapco structure is unstable and unsound, the contaminated soil cannot be removed without removing this structure. The Tapco building is a serious detriment to the Rock River corridor as it has been vacant for several years and is deteriorating with pieces of the building having fallen onto South Main Street and the public sidewalk, creating a critical health hazard.

The cleanup dollars provided by the requested grant will provide the City with the ability to remove the contaminated soil (once the structure has been removed using other funding sources) and expand Davis Park into the former Tapco building site. The expansion of Davis Park would allow for larger entertainment venues. The cleanup and removal of the Tapco property and the expansion of Davis Park will act as a catalyst for redevelopment of nearby brownfield properties along the Rock River corridor. Possible redevelopments include the adjacent 225,000 square foot Amerock (Ziock) Building which is City-owned, as well as former warehouses along Cedar Street including the Warshawsky property which has long been a detriment to the area.

Very truly yours,


Lawrence J. Morrissey
Mayor
City of Rockford

LJM/wmd

City of Rockford, Illinois USA

425 East State Street Rockford, Illinois 61104-1068 USA
(815) 987-5590 (815) 967-6952 fax www.rockfordil.gov

- a) **Applicant Identification:** City of Rockford, 425 East State Street, Rockford, Illinois, 61104
- b) **Applicant DUNS Number:** 136666174
- c) **Funding Requested:**
 - i. Grant Type: Cleanup Grant
 - ii. Federal Funds Requested: \$200,000
 - iii. Contamination: Hazardous Substances
- d) **Location:** City of Rockford, Winnebago County, State of Illinois
- e) **Property:** Tapco Site, 502 S. Main Street, Rockford, Illinois, 61101
- f) **Contacts:**
 - i. **Project Director:** Wayne Dust, AICP, Planning Administrator
Department of Community and Economic Development
425 East State Street, Rockford, Illinois 61104
P: 815.987.5636 F: 815.967.6933
Email: wayne.dust@rockfordil.gov
 - ii. **Chief Executive:** Mayor Lawrence J. Morrissey
425 East State Street, Rockford, Illinois 61104
P: 815.987.5590 F: 815.967.6952
Email: susan.skinner@rockfordil.gov
- g) **Date Submitted:** November 28, 2011
- h) **Project Period:** October 2012 – September 2015
- i) **Population:** 152,871 (2010 Census)
- j) **Special Considerations:** (Attached)

Project Description

1. Community Need

a) Health, Welfare and Environment

i) Effect of Brownfields on Targeted Community: The City of Rockford Tapco Site is located at 502 South Main Street and lies adjacent to one of the nine Brownfield Clusters identified in the Community Wide Assessment Grant application for 2011, the South Main/Water Power District. The Tapco Site is located within Census Tract 28, one of the most economically distressed areas in Rockford, and this tract is defined as the Targeted Community for the Tapco Site. In addition to the 22 acre South Main/Water Power District Brownfield Cluster where the Tapco Site is located, Census Tract 28 also includes the 25 acre South Main Rail Yards Brownfield Cluster, the 32 acre Morgan Street Corridor Brownfields Cluster, and the 32 acre Barber Colman Village Brownfields Cluster, as well as smaller Brownfield sites such as the 4 acre Cedar Street Corridor and the 4 acre Nelson Knitting Site. Overall, Census Tract 28, which is the Targeted Community, includes 119 acres of Brownfields sites within three major Brownfields Clusters as well as smaller sites. Census Tract 28 alone encompasses three of the nine major Targeted Brownfields Clusters in the whole City of Rockford.

Each of the three Brownfield Clusters (BCs) located within the Targeted Community has a severe impact on the health, welfare and environment of adjacent residential neighborhoods within the Targeted Community. Based on the Phase I and Phase II Environmental Site Assessments that have been performed within Census Tract 28, these residents have potentially been exposed to a large number of health, welfare and environmental impacts due to more than one hundred and twenty years of industrial processes taking place at these Brownfield sites. The Water Power District BC, adjacent and south of the Tapco Site, is Rockford's first industrial area. This area has had a concentration of industrial uses since the 1830s, initially using water power for industrial processing. The South Main Rail Yards BC has had a significant history of industrial use since the 1860's. Barber Colman Village BC and the Morgan Street Corridor BC have been industrialized since the 1880's. In addition to the Brownfields Clusters themselves, the Targeted Community has three major rail lines (the earliest from 1858), a rail yard, portions of two additional rail yards, and the air pollution associated with this rail activity located within its boundaries. The Tapco Site is in fact located adjacent to the Union Pacific Rail Road line which has been there as multiple entities since 1858. The concentration of these rail lines, each of which crosses the Rock River to enter the Targeted Community, contributed heavily to the industrial density within this area. In addition, South Main Street/Illinois Route 2 is heavily traveled and carries a considerable amount of truck traffic. This street is adjacent to the Tapco site along the west.

In addition to the soil, groundwater and air quality issues associated with the industrial and transportation concentrations within the Targeted Community, this area has the oldest housing stock in the City of Rockford and the associated lead based paint hazards that are endemic with this housing stock. The average home is more than 70 years old. Winnebago Health Department Statistics for blood lead testing in children are available for a two year period, (8-1-07 to 8-31-09); this data was gathered by Zip Codes and is not available at the Census Tract level. Census Tract 28 is located within Zip Codes 61101 and 61102. The results of this testing indicate high incidences of elevated lead levels in the bloodstream of children residing in the two US Postal Zip Codes for the

Targeted Community, Census Tract 28, within which the Tapco Site is located. The blood lead testing showed that 4.5% of the children initially tested had lead levels at 10 or more micrograms per deciliter. County-wide figures indicate that 2.9% of the 10,157 children initially tested had elevated lead levels. If the two Zip Codes that include the Targeted Community are not included, the entire county excluding these two zip codes has an incidence in the initial test of only 1.1%. It is further estimated that within the Targeted Community approximately 65% of the housing units pose lead-based paint risks to their occupants. (Winnebago County Health Department)

This high incidence of elevated lead levels among the children of this two Zip Code area that includes the Targeted Community (Census Tract 28), coupled with the socioeconomic and housing data clearly show that the Targeted Community is an area with an older housing stock where lead-based paint has not been abated and, instead, the housing stock is deteriorating due to disinvestment by the property owners. This disinvestment results in a high rate of elevated lead levels in the children and the related health issues within the Targeted Community, and is symptomatic of an area heavily impacted by Brownfields.

For several decades up through the 1950's, the industries in the Targeted Community were part of a thriving "walk to work" community with thousands of workers and an extensive variety of retail establishments serving this workforce. With the major decline in these industries, at least partially due to antiquated industrial facilities, these Brownfields now contribute to crime and deterioration of the surrounding residential neighborhoods and form physical barriers to normal social interaction. In many ways, Brownfields such as the Water Power District, which the Tapco Site is adjacent to, form physical and psychological barriers between the adjacent neighborhoods to the south and west, and the Downtown Area which lies north of this Brownfield. This division seriously impacts the welfare of our residents. It is not surprising that there has not been a major grocery store located within several miles of the Targeted Community for almost 25 years until the City of Rockford, with assistance from USEPA and HUD funding, developed a grocery store approximately eight blocks from the Tapco Site.

One major indicator of the health and welfare of this Targeted Community is population gain or loss. Not surprisingly, this area has experienced a major decline in population since 1960. The population in Census Tract 28 has declined from 2,468 in 1960, to 2,153 in 1980, to only 1,922 in 2000, and to 1,828 in 2010. This is a 25.9% drop in population during the same timeframe that the City of Rockford grew from a population of 126,706 in 1960, to 152,871 in 2010, which demonstrates a 20.7% increase. (Source: US Bureau of the Census: 1960, 1980, 2000 and 2010)

ii) *Sensitive populations*: Rockford is a diverse community with a highly sensitive population according to the 2010 Census and the 2009 American Communities Survey (See the Demographic Information Chart below). For the City as a whole, the minority population is 34.9%. The African-American population is 20.5% of the total population, while the Hispanic or Latino population is 15.8%. Also, 21.9% of the total population in Rockford is living below the poverty level, and the median household income was \$38,486 in 2009. For the Targeted Community, Census Tract 28, the minority population is 64.1%, the African-American population is 33.5%, the Hispanic population is 55.8%, and those below the poverty level comprise 40.8% of the population. The median household income in the Targeted Community was \$23,569 in 2009, considerably less than the overall City of Rockford figure (data in this Section is from the 2010 Census or 2009 American Communities Survey and local unemployment data from the Illinois Department of Employment Security).

The Targeted Community, described above, clearly has a strong concentration of sensitive populations when compared to the City as a whole, specifically low income and minority population concentrations. In addition, there are other indices of sensitive populations that should be noted. In the Targeted Community, 8.4%% of the households receive public assistance income, compared to 2.5% in the City as a whole. The Targeted Community also has a higher population of young children (under 10) than the City as a whole, 20.9% compared with 7.1%; a higher percentage of children (under 15) than the City overall, 29% compared to 14.1 %; and a higher percentage of women of child-bearing age (15-49) than the City overall, 48.8% of the female population versus 38.9%. In terms of the total population (both genders), women of child-bearing age comprise 23.9 % of the Targeted Community versus 20.1% for the City as a whole. The Targeted Community is predominantly a renter-occupied area, with owner-occupied units accounting for only 48.6% of the occupied units compared to 58.4% in the City as a whole. The housing stock in Census Tract 28 has a median year built of 1950 compared to 1959 for the City. These demographics clearly demonstrate the concentration of sensitive populations within the Targeted Community.

b. Financial Need

	Target Community/ Census Tract 28	Rockford	Illinois	National
Population:	1,828	152,871	12,830,632	308,745,538 ¹
Unemployment:	Greater than 20%*	15%**	9.5%	9.6% ²
Poverty Rate:	40.8%	21.9%	12.4%	14.3% ³
Percent Minority:	64.1%	34.9%	28.5%	26.7% ¹
Per Capita Income:	\$11,654	\$21,757	\$28,469	\$ 26,530 ³
Never Finished HS	52.4%	20.9%	14.48%	15.70%

¹Data is from the 2010 U.S. Census data and is available at <http://www.census.gov/>.

²Data is from the Bureau of Labor Statistics and is available at www.bls.gov

³Data is from the 2009 American Community Survey and is available at http://www.census.gov/newsroom/releases/archives/income_wealth/cb10-144.html

*Estimate based on Illinois Monthly Labor Force Report, Illinois Department of Employment Security and previous studies of unemployment in economically disenfranchised areas of Rockford

** Illinois Monthly Labor Force Report, Illinois Department of Employment Securities, November 2011 Report

i) Economic impacts of Brownfields on the Targeted Community: Average unemployment for 2005 was estimated at 8.1% for the entire City, but was 19.4% in the Targeted Community and surrounding areas. Currently, the unemployment estimate for the Targeted Community/Census Tract 28 is greater than 20% based on the current figure of 15% for the City of Rockford and previous studies (see table above). The 2009 American Communities Survey data also reveals that 20.9% of the City's population aged 18 and older never finished high school, while in the Targeted Community the figure is 52.4%. Median income levels are \$23,569 for the Targeted Community, which is considerably lower than the City-wide median income of \$38,486.

Based on the demographics shown in the table above, it is no coincidence that the Targeted Community demonstrates extremely high levels of economic need. Per capita income and poverty rates clearly document this financial need. All of the demographics verify that the Targeted Community is an economically disenfranchised area with a predominantly minority population. The combination of the concentration of Brownfields, lack of basic retail and other services, the aging housing stock and general lack of investment by the private sector have resulted in the precipitous decline of this Targeted Community which is reflected in both the concentration of poverty and minority populations as well as a severe decline in population. This trend will continue unless these Brownfields are assessed, cleaned and redeveloped. Clearly, there are environmental justice issues present in this Targeted Community and it would be a serious injustice if these Brownfields were not addressed by continuing assessment and cleanup programs. The Tapco Site is one of three sites within the Targeted Community that is poised for remediation. The two additional sites, Lorden/Eclipse and Depot, are properties where Cleanup Grant applications will also be filed.

ii) Funding and resource limitations: Overall, the City of Rockford has received six (6) USEPA Brownfield Assessment Grants. The first four grants, FY 2001, FY2004, FY 2006 and FY 2008 have successfully assessed and remediated Brownfields sites within the City, and funding has been completely exhausted. A FY 2011 Site Specific Assessment Grant for the South Main Rail Yards successfully funded Phase II work at the Depot Site and the Lorden/Eclipse Site, including the demolition of two structures on the sites; this grant is fully accounted for. The FY2011 Community-Wide Assessment Grant is already largely programmed for three (3) additional Brownfield Clusters; Downtown, Morgan Street Corridor and West State Street. Progress has been made at other Targeted Brownfield Clusters, such as the West State Street Corridor where approximately 20% of the 47 Brownfield sites have had Phase I/Phase II ESAs performed, and the Downtown where approximately 10% of the Brownfield sites have had Phase I/Phase II ESAs performed. Other than eligibility determinations, the other targeted Brownfield areas have had limited environmental assessment work performed due to the exhaustion of the previous Assessment Grants. The FY 2011 Community Wide Assessment Grant will increase these acreages and percentages somewhat before the grant is exhausted, but there is a good probability that this program will also identify several additional sites needing Cleanup funding.

For the Tapco Site, Assessment work was completed using the FY2011 Community Wide Assessment Grant and Supplemental Revolving Loan Fund of \$700,000 (USEPA) is earmarked for the Tapco Site. However, Tapco Site Cleanup will require removal of the 125,000 square foot, 6 story Tapco Building. This demolition, expected to cost \$1.1million, will more than exhaust the Revolving Loan Fund, leaving soil cleanup to be funded by this proposed Cleanup Grant.

The State of Illinois River Edge Redevelopment Program provides assessment and cleanup funds to environmentally challenged properties adjacent to rivers in Illinois. The River Edge program will provide assistance to the City of Rockford for City-owned Brownfields sites, but only if the City is able to enter into an Agreement with a Developer to redevelop the site, and only if the State of Illinois sells Capital Development Bonds. The Tapco Site, once it is cleared and cleaned, will be occupied by the expansion of adjacent Davis Park.

2. Project Description and Feasibility of Success

a. Project Description:

i) *Conditions of the existing property:* The conditions at the Tapco Site include soil and groundwater environmental issues located under the eastern half of the Tapco Building. Because of the

condition of the Tapco Building, the soil cannot be removed until after the building is removed. The contaminants of concern in the soil include benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, benzo(k)fluoranthene, indeno(1,2,3-cd)pyrene and inorganics (arsenic, lead, and iron). These organics and inorganics exceed their respective IEPA Tiered Approach at Corrective Actions (TACO) Tier I Residential Remedial Objectives (RO's) for the Soil Ingestion Route. Trichloroethylene was found to exceed Residential Tier I for the Soil Inhalation Route. Several organics and inorganics exceed the Tier I Residential RO's for the soil component of the groundwater ingestion exposure route include tetrachloroethylene, trichloroethylene, 2-methylnaphthalene, carbazole and lead. Also, aluminum, antimony, iron, lead, manganese, vanadium, tetrachloroethene, trichloroethene and vinyl chloride all exceed Tier I groundwater remediation objectives for the Class I groundwater ingestion exposure pathway. This information is from the Comprehensive Site Investigation Report (April 2011).

The Rock River is located approximately 250 feet to the east and is the most limiting receptor. Tier 2 modeling and Tier 3 modeling, or both, are proposed with respect to the upper unconfined aquifer and bedrock aquifer to predict the extent of remaining groundwater contamination and whether surface water can be expected to be impacted.

ii) *Cleanup Plan*: In response to identified environmental issues in the soil and groundwater, the City of Rockford proposes to perform the following Cleanup activities at the Tapco Site:

- 1) Removal of the Tapco Structure (using the RLF program) and excavate impacted soil areas to a maximum depth of 5 feet below ground surface. Conduct waste profiling on impacted soil and transport to a licensed and permitted disposal facility/ landfill. Conduct Tier 2 or Tier 3 Modeling of the aquifers. Install an engineered barrier as a component of site restoration and expansion of Davis Park to include the Tapco site.

b. Budget for USEPA Funding and Leveraging Other Resources

i) *Budget Table*

Budget Categories	Project Tasks				Total
	Task 1	Task 2	Task 3	Task 4	
(programmatic costs only)	Community Involvement	Cleanup Planning / Action Plan	Soil removal and disposal; engineered barrier 4	Tier 2 and Tier 3 Modeling	
Personnel					
Fringe Benefits					
Travel ¹					
Equipment ²					
Supplies					
Contractual ³		\$15,000	\$170,000	\$15,000	\$200,000
Other (specify) _____					

Subtotal		\$15,000	\$170,000	\$15,000	\$200,000
Cost Share	\$5,000	\$10,000	\$25,000		\$40,000
Total	\$5,000	\$25,000	\$195,000	\$15,000	\$240,000
1 Travel to Brownfield-related training conferences is an acceptable use of these Grant Funds.					
2 USEPA defines equipment as items that cost \$5,000 or more with a useful life of more than one year. Items costing less than \$5,000 are considered supplies.					
3 Applicants must comply with the procurement procedures contained in 40 CFR 31.36, or for non-profits, with 40 CFR 30.40 through 30.48					
4 Estimated cost of the Soil Cleanup is \$175,000- \$245,000. The engineered barrier is estimated at \$40,000. The City will request IEPA River Edge funds to cover remaining funding gaps.					

Task 1: Community Involvement

The objective of the Community Involvement task is to inform the City as a whole, and the community near the Tapco Site area, of the City's intent to conduct environmental cleanup activities and to provide timely details on cleanup plans and redevelopment efforts for the site. The City intends to rely primarily upon the following Community Outreach efforts: 1) monthly Ward Meetings conducted within the Targeted Community by Alderman Venita Hervey; 2) promotion of Planning and Development Committee Meetings of the City of Rockford, which are open to the public, published in all the media, and reported upon by the media; 3) the City of Rockford website, and press releases and legal notices in the local newspapers; 4) monthly meetings with the Brownfield Community Partners, and; 5) quarterly meetings with the Brownfield Redevelopment Advisory Committee. A Community Relations Plan will be prepared and Mr. Wayne Dust, the City of Rockford Brownfields Coordinator, will oversee these efforts. A \$5,000 Cost Share amount from the City is budgeted for this task.

Task 2: Cleanup Planning/ Action Plan/ Cleanup Bid Specifications/ RFP Process

The Brownfields Coordinator is Wayne Dust, who has served as a Planning Administrator for 37 years and has eight (8) years of Brownfields experience. Mr. Dust coordinates with the Illinois Environmental Protection Agency (IEPA) on a regular basis, including the enrollment of sites in the Site Remediation Program (SRP) and the review of Remedial Action Plans. An environmental consulting firm will be selected to assist in preparation of these documents. Mr. Dust will use his extensive experience on past Brownfields Assessment and Cleanup programs to manage and oversee the activities that are necessary for the Tapco Site prior to remediation. This includes the preparation of draft bid specifications for contractors in order to ensure that the appropriate tasks are completed and required regulations are followed. This also allows the City to obtain fair pricing and follow the appropriate procurement process. Mr. Dust will also prepare the Action Memo and review the final ABCA. The \$25,000 budgeted for this Task includes Contractual Costs of \$15,000 and a City Cost Share of \$10,000.

Task 3: Soil Removal and Disposal and Engineered Barrier (Site Cleanup)

Based on the draft ABCA, soil removal of up to five feet in depth will be needed for the eastern half of the building footprint, an area of approximately 12,500 square feet. The estimate for the soil removal is between \$175,000 and \$245,000. The total cost of the engineered barrier is expected to be \$40,000. The budgeted amount for this task is \$195,000, and will be supplemented by state and local funds such as the IEPA River Edge funds and the Rockford Park District Funds. The Site Cleanup

Task includes labor hours for cleanup activities management, IEPA SRP fees, and provision of security.

Task 4: Tier 2 and Tier 3 Modeling.

The Tier 2 and Tier 3 Modeling of the upper unconfined aquifer and the bedrock aquifer are necessary to predict the extent of remaining groundwater contamination and whether surface water can be expected to be impacted. This modeling will help determine the need for groundwater treatment, or potentially, the issuance of a No Further Remediation Letter from IEPA.

ii) Tracking and Measuring Progress: Tier 2 and Tier 3 Groundwater Modeling at the Tapco Site will be the key component in determining the need for additional remediation efforts. If groundwater treatment is required, groundwater monitoring will document progress towards achieving both the short term and long term project outcomes and outputs for the Tapco Site.

The short term project outputs of this groundwater monitoring activity will be the measurable lowering of the groundwater contaminants of concern towards the IEPA TACO Tier I standard. The short term project outcome will be the Draft No Further Remediation Letter from the IEPA.

The long term project outputs of this groundwater monitoring activity would be the measurable compliance of the groundwater contaminants of concern with the TACO Tier I standards. The long term outcome would be receipt of the Final No Further Remediation Letter from the IEPA.

iii) Leveraging: The City will attempt to utilize the State of Illinois River Edge Program or funding obtained from the Rockford Park District to fill any Cleanup funding gap.

In addition to the River Edge Program funding, the City is prepared to use its TIF Bonding capability to contribute to the Davis Park expansion project at the Tapco Site. The City has used this TIF bonding capability effectively in the redevelopment of two additional Brownfield sites. At the Reed-Chatwood Storage Site, TIF Bonding and a Brownfields Economic Development Initiative (BEDI) Grant were used to redevelop the corner of a Brownfield site for construction of a new grocery store in 2003. IEPA Assessment Grant funds had been used for the assessment. During the summer of 2008, the City of Rockford used its TIF Bonding Authority to leverage \$1.1 million to prepare a portion of the City Yards site for a \$10 million expansion of Liebovich Steel, which initially included the addition of an 80,000 square foot structure and creation of 10 jobs. This is the first phase of a four-phase expansion that will cost \$40 million and produce 40 jobs when completed. The City expects that the removal of the Tapco Building, the Cleanup of the Tapco Site and the expansion of Davis Park will increase the chance that additional developers will come forward to renovate nearby vacant or underutilized properties.

c. Programmatic Capability and Past Performance

i) Programmatic Capability: The Brownfields Program Management System in place at the City of Rockford consists of the Planning Administrator, Wayne Dust, and support staff in both the Community and Economic Development Department (CED) and the Finance Department.

Wayne Dust is the Planning Administrator for the City of Rockford and a designated Brownfields Coordinator by USEPA Region 5 since 2003. Mr. Dust has a Masters Degree in Geography from Kent State University and over 36 years of City Planning experience, 31 years of which have been with the City of Rockford. He is a member of the American Institute of Certified Planners (AICP).

As Brownfields Coordinator, he manages the USEPA Brownfields Grants as well as the environmental consultants under contract with the City for the Brownfields Program. Mr. Dust prepares the Quarterly Reports for each grant, maintains the spreadsheet for each grant, reviews the technical reports and invoices prepared by the environmental consultants, coordinates with the City Administration, communicates with the Aldermen and representatives of the Brownfield-impacted communities, and provides a wide variety of additional Brownfield-related work items.

The support staff in the CED for the Brownfields Program has been and will continue to be Jonah Katz, Arianne Clark and Brenda Alegria. Jonah Katz, Associate Planner, has a Master's Degree in City Planning from the University of Illinois and 5 years of city planning experience. He received his certification from the American Institute of Certified Planners (AICP). Mr. Katz provides assistance in the Brownfield Redevelopment planning process and coordinates with local citizen groups such as the South Main Revitalization Strategy's Project Study Group. Mr. Katz assisted the planning consulting firms hired to perform the "South Main Revitalization Strategy" in conducting 4 community workshops between January and October of 2011. Between 40 and 80 people attended these community workshops. The Project Study Group was well represented at each community workshop. Mr. Katz is the third Associate Planner that Mr. Dust has trained to assist in the Brownfields program. In the event that Mr. Katz should leave the City of Rockford, the position would be filled in a timely manner since it is a budgeted position.

Arianne Clark, Administrative Assistant to the CED Director, has a degree in Computer Science and 10 years of experience in payroll, accounts payable and general office administration. Ms. Clark handles all payments to the environmental consulting firms under contract with the City of Rockford, and coordinates with Anthony Cortez of the Finance Department who performs the draw downs from USEPA. Brenda Alegria has translated many of the Planning Division's documents into Spanish. With Mr. Katz, Ms. Alegria has walked the commercial area in the 900-1100 blocks of South Main Street to introduce Hispanic business owners to the South Main Revitalization Strategy effort. Ms. Alegria will translate community involvement notices and reports for the Community Involvement process in conjunction with future USEPA Grant awards.

Current environmental consulting firms under contract with the City had competed through an RFP process for an earlier USEPA Assessment Grant, and have been granted extensions by the Rockford City Council to perform work required for the FY 2011 Assessment Grants. Upon receiving word of a successful grant application for FY 2013, the City of Rockford will initiate a new RFP process for that grant or grants.

ii) Adverse Audits: There has been only one (1) minor adverse finding from the July 26, 2006 OMB Circular A-133 Audit performed by McGladrey and Pullen for 2005. Finding 2005-7 stated that "the City is required to submit quarterly reports to the USEPA within 30 days after the end of each quarter that details expenditures and other activities under the programs, as well as progress being made at the clean-up sites. We noted that out of eight quarterly reports that should have been filed for the year ended December 31, 2005, six of the reports were late..." The Cause stated "Delays in submitting the quarterly reports have been due to delays in receiving billings from the five environmental consulting firms under contract to perform the environmental work for the City. Section 2.2 of the required quarterly report by USEPA requires documentation of the "Funds Expended" during the reporting period". The Management's Response by the City stated... "If necessary, we are prepared to send an incomplete report to meet the USEPA Cooperative Agreement deadline to be followed by a final report when we have received all of the information".

It should be noted that all quarterly reports from July 30, 2006 through the present have been submitted on time, with the exception of two reports submitted one day late.

iii) Past Performance: Currently has USEPA Brownfields Grants and has received Previous Grants: The City of Rockford has managed numerous USEPA Grants throughout the past eight (8) years. During the fall of 2003, the City of Rockford entered into a Cooperative Agreement with USEPA for two (2) Assessment Grants totaling \$400,000 awarded to Rockford during the 2002-2003 grant cycles. Contracts were awarded to two (2) environmental consulting firms in January of 2004 and these assessment activities were completed during the spring of 2008, with numerous ESAs performed and all funds expended. Significant accomplishments of the 2004 Hazardous Substance Assessment Grant include partial completion of a Phase II ESA and Remedial Action Plan for the 12 acre Barber Colman industrial complex, and completion of a desktop Phase I for the 50+acre North and South Barber Colman Village Areas. For the Petroleum Grant, Phase I ESAs were performed at seven (7) West State Street Corridor sites and two (2) Downtown sites, including a four-block area cleared and currently occupied by the new County Justice Center. The Quarterly Reports were prepared by Mr. Dust, submitted to USEPA, and approved on a regular basis. The FY 2004 Assessment Grants were closed out at the end of 2008.

During the fall of 2005, the City of Rockford entered into a Cooperative Agreement with USEPA concerning two (2) Assessment Grants totaling \$400,000 awarded to Rockford during the 2004-2005 grant cycle. Contracts were awarded to three (3) environmental consulting firms during February of 2006 and this Assessment Grant was completed in the summer of 2008, with all funds expended. Major Phase II ESA work was performed at the City-owned Barber Colman sites. Phase I and Phase II ESAs were completed for the City-owned former Ingersoll Site, a 5 acre property on the bank of the Rock River. This site was then enrolled in the IEPA Site Remediation Program. Phase I ESAs were also performed on Keith Creek Greenway Sites prior to City acquisition. For the Petroleum Grant, several additional Phase I ESAs and one Phase II ESA were performed in the West State and Downtown areas. Quarterly reports were submitted by Mr. Dust, and approved on an ongoing basis for these Grants. The FY 2006 Assessment Grants were extended to September 30 of 2008 and closed out later that year.

The City of Rockford received a \$400,000 Community Wide Assessment Grant for the FY 2008 period. This grant has been used to complete Phase II ESA work at the Barber Colman Complex (Hazardous Substances) and for Phase I and Phase II ESA work at several Downtown Sites. This Grant is completed and will be closed out in 2011. Three Cleanup Grants were also received in 2008. Asbestos removal contracts have been awarded And groundwater remediation has taken place at this 15 acre site. After a six-month extension this grant was completed in early 2011 and has been closed out (confirmed by correspondence from USEPA). The City is under a pre-development agreement with Belmont Sayre concerning the feasibility of an adaptive reuse project with the intent to provide housing, riverfront open space, educational opportunities, and additional retail activity at the Barber Colman Site following completion of the cleanup.

The City of Rockford also received a Brownfields Revolving Loan Fund Award of \$500,000 in 2000. Under Mr. Dust's supervision, this Revolving Loan was used to clean up the Invensys Metal Plating site at Barber Colman during 2005, and the site is to be used as a future section of the Riverfront Greenway along the Rock River. The Revolving Loan Fund Grant has been completed and closed out, with all funds expended (confirmed by correspondence from USEPA). The City is taking steps to revolve these funds through legal action against a former property owner. In addition, two (2)

IEPA Assessment Grants totaling 240,000 were awarded, completed, and closed out between 2001 and 2004. These assessment efforts, together with the City's acquisition and clearing of a mixed industrial and commercial site, culminated in the receipt of a No Further Remediation letter from the IEPA. This five (5) acre site has been acquired by the City of Rockford for the New Federal Courthouse, which is now nearing completion by the US General Services Administration.

The Brownfield Pilot Grant and the current Assessment Grants have been instrumental in preparing two (2) sites for major governmental facility construction projects, including the new Federal Courthouse and the Winnebago County Justice Center. Each of these projects was a \$100 million dollar construction project. A current Cleanup Grant for the Ingersoll Site will pave the way for the adaptive reuse of a large open industrial building for an indoor sports facility.

3. Community Engagement and Partnerships

a) Plan for Involving the Affected Community:

Rockford understands the importance of involving the community in Brownfield redevelopment. The City has been actively involved with various stakeholders within the community in its Brownfield initiatives. As the Tapco Site is located within the Fifth Ward, Wayne Dust, local Brownfield Coordinator and Planning Administrator for the City of Rockford, has presented an overview of the City's intent to apply for USEPA Brownfield Assessment and Cleanup Grants at several of the Fifth Ward meetings at the Montague Branch Library, at City Hall and at other nearby sites. When Alderman Victory Bell did not run for alderman during the 2008 election after 30+ years of service, Mr. Dust saw the need for a general and detailed presentation of the USEPA Brownfields program for the new Fifth Ward Alderman, Venita Hervey. A general presentation was made at the June 26th, 2008 Fifth Ward Meeting and a more detailed presentation was made at a September 25, 2008 Meeting. At this September 2008 meeting, Mr. Dust provided a status report on current environmental assessment activities and indicated the City's intentions to apply for Assessment and Cleanup Grants and perform environmental assessments at additional locations within the Fifth Ward. Status reports on the Brownfield program and the City's plans to apply for Brownfield grants have been submitted throughout 2009, 2010 and 2011. Most recently, during 2011, brief presentations were made at the fifth Ward Meetings on January 27th, April 14th, June 28th and October 27th. A public hearing concerning the Cleanup at the Ingersoll Site and the use of RLF funds at the Tapco Site was conducted October 31, 2011 at City Hall. A November 21, 2011 Public Meeting was held concerning the current USEPA Grant Program and the proposed submittals. The citizens residing within the Fifth Ward have been kept well informed of the City's efforts to redevelop numerous Brownfield sites, and continue to be very supportive of the City's efforts. Mr. Dust will continue to provide status reports and seek input from the community at these Fifth Ward Meetings. In addition, Brenda Alegria will accompany Mr. Dust to answer questions and provide information to the Hispanic Community. The current Fifth Ward Alderman, Venita Hervey and the Retired Fifth Ward Alderman who has remained active in the community, Victory Bell, have both been very supportive of the Brownfields Program.

b) Identification and Establishment of State and Local Partners:

Although the City of Rockford had been awarded two IEPA Brownfield Assessment Grants in the past, the recent designation of the City of Rockford River Edge Zone has created a major new opportunity to partner with IEPA on redevelopment projects that are planned for Brownfields sites requiring cleanups. The IEPA funds are severely restricted and do not include cleanup other than soil and groundwater. Combined with USEPA programs, however, the City will strive to tap into

this valuable resource to accomplish the redevelopment of Brownfield sites. Mr. Dust met with Mr. Doug Scott, the IEPA Director at the time, concerning this new program.

The City is also actively developing partnerships at local, state, and Federal levels. The City developed a Master Plan with the assistance of the Rockford Local Development Corporation (RLDC) for the Barber Colman Village area and continues discussions with potential developers. Working with the RLDC, after assessment and remediation was completed, a portion of the former Barber Colman facility was redeveloped as a grocery store in order to serve the surrounding area. The City has also partnered with Winnebago County and the U.S. General Service Administration for the development of the \$100 Million Winnebago County Justice Center (completed in July of 2007) and the \$100 Million Federal Courthouse (completed late in 2011).

The City plans to develop additional partnerships to successfully accomplish sustainable development at the Tapco Site. A good example is the partnership developed for the Ingersoll Site as part of the redevelopment of the Ingersoll /Watch Factory Targeted Brownfield area located on the east bank of the Rock River directly across the Rock River from the Tapco Site in the Third Ward. This site is planned to become a Whitewater Park (kayaking and rafting) adjacent to a major indoor sports facility proposed at the former Ingersoll facility. Success for this project requires a partnership between the City, who owns half of the proposed site; Commonwealth Edison, who owns the other half of the site in addition to the dam; the Winnebago County Health Department, located adjacent to the ComEd site, and; the Illinois Department of Natural Resources, who is interested in both modifying the dam to become a fish passage and serving the proposed Whitewater Park. The City of Rockford has completed a study of the structural integrity of the dam and the feasibility of re-watering the former hydro-electric plant water race; this \$187,000 investment demonstrates the City's commitment to this project. The Rockford Park District anticipates owning and operating the Whitewater Park when completed. Brownfield issues include a former coal-fired powered generating plant, former hydro-electric plant, two (2) former foundries, a former transformer storage yard, and underground petroleum storage tanks. The USEPA could be a possible partner in this site for time critical removal actions similar to the Sparkle Cleaners site in Rockford during February of 2008.

Successful redevelopment efforts at the Tapco Site will require partnership with the State of Illinois and the Rockford Park District concerning the improvements required, to implement the plan for the Davis Park expansion, and the pathways and greenway corridors to be developed along the Rock River and major creeks flowing into the Rock River. Davis Park, soon to include the Tapco Site, will be the focal point for major extensions of the Rock River Recreation Path south along the Rock River, and the development of the long-planned Davis-Pec Path connection west from the Rock River Recreational Path along the Kent Creek basin towards the Pecatonica Prairie Path. When completed, the Davis-Pec connection will provide a continuous pathway from Freeport, Illinois to the east edge of McHenry County, a distance of about sixty miles.

c) Description of and Role of the Key Community-based Organizations:

i) The Rockford Local Development Corporation (RLDC) is a not-for-profit development company, certified by the Small Business Administration, that strives to be a champion for small business and economic development. RLDC has frequently partnered with the City, including the development of a Gray's IGA Store on a former Brownfield site located on South Main Street, and a Brownfields Cleanup at the former Invensys Site. Most recently, the RLDC partnered with the City for redevelopment of a portion of the Reed-Chatwood Storage Site as a medical clinic and general

merchandise store. RLDC has also partnered with the City to relocate families from the flood-impacted Keith Creek floodway, where over 100 homes were severely damaged by two severe floods in less than one year's time. The RLDC has indicated its intent to participate in the Tapco Building Demolition by functioning as the RLF loan recipient and managing the demolition project. Mr. John Phelps is the Executive Director of the RLDC [815.987.8675].

ii) The Rockford Metropolitan Agency for Planning (RMAP) is the Metropolitan Planning Organization for the Rockford Metropolitan Area under the supervision of the Federal Transportation Administration. Over the past several decades, this organization and its predecessor, the Rockford Area Transportation Study, have provided transportation planning required by the Federal Highway Act of 1962 ("3 C" Planning Process). In recent years, RMAP has partnered with the City of Rockford specifically in the development of a new Amtrak Station, proposed at the site of the previous station where service had been terminated in 1982. This Depot Site and the adjacent Lorden/Eclipse Site were acquired by the City of Rockford in September of 2010 from the Canadian National Railroad. Upon remediation of the Depot Site and Lorden/Eclipse Site, RMAP will channel funding commitments for the pre-construction phases of the Amtrak Station and will continue efforts to secure funding for construction. Steve Ernst is the Executive Director of RMAP [815.967.7611].

iii) The Rockford Park District is a separate regional taxing district with an elected governing board. The District has been a long term Community Partner with the City of Rockford in the development of Parks and Pathway systems. The City of Rockford and the District have coordinated planning efforts for several decades, including the City's incorporation of the Park District's Park and Pathway plans into the City's 2000 Comprehensive Plan (approved in 1982) and the 2020 Plan (approved by City Council in 2004). Additional efforts with the District included the construction of the Bicentennial Bike Path (1970's), the Mel Anderson Path (1980's) and 10th Avenue Park expansion (the last few years). The District and City are currently coordinating the extension of the Rock River Recreational Path south from Davis Park through the Water Power District, Morgan Street Corridor, and Barber Colman Complex. Similar efforts are being made to extend the Davis-Pec Path through the Lorden and Depot Sites approximately 3 blocks south of the Tapco site. Monthly coordination meetings are held between the City of Rockford's CED, Public Works Department, and the Park District staff. The Director of the Rockford Park District is Tim Dimke [815.987.8800].

4. Project Benefits

We understand the importance of identifying the outcomes and outputs for our Brownfields Program and how they promote the general welfare of the Targeted Community through the improvement of the public health and safety, economy and environment . We also understand it is important to document how these outcomes contribute to the community "vision" for the revitalization of the City's Brownfield sites. A summary of the outcomes and outputs is followed by more detailed documentation of specific benefits to the Targeted Community:

Outcomes of Cleanup Grant Funding:

- Acreage of land in which environmental threats have been characterized: this proposed Cleanup Grant at the Tapco Site encompasses .6 acres
- Acreage of land positioned for reuse: based on the "South Main Revitalization Strategy" recently completed by the Lakota Group, Cleanup of the Tapco Site and subsequent construction of the Amtrak Station 3 blocks to the south provides a catalyst for

redevelopment of an additional 15 to 20 acres of mixed use on privately-owned properties along the 400 through 800 blocks of South Main Street

- Jobs leveraged: the expanded Davis Park is expected to require 2 additional Park District staff persons; the anticipated private development along South Main Street could produce 50 to 100 jobs
- Funding leveraged: through the Rockford Park District and IEPA River Edge Programs, as much as \$250,000 in Cleanup and Park expansion funding is estimated (does not include USEPA RLF funding of \$700,000 plus \$140,000 in local match for demolition of the Tapco Building)
- Acreage of green space created or preserved: 100% of the site, 0.6, acres would become an expansion of the adjacent Davis Park

Outputs of Cleanup Grant Funding:

- Measurements of the Contaminants of Concern: monitoring of groundwater contaminants at the Tapco Site until TACO Tier 1 objectives are met and until a No Further Remediation letter is received from IEPA for the Tapco Site
- Removal of the contaminated soil; installation of the engineered barrier to eliminate remaining contaminated soil exposure pathways; groundwater treatment, if required

a) Welfare and Public Health: There are multiple public health and welfare benefits from the proposed Cleanup of the Tapco Site. The Tapco Site is adjacent to Davis Park which is a riverfront park along the Rock River. The Rock River is a very popular location for local fisherman, especially a few hundred feet south of Davis Park, just below the Fordham Dam. The effectiveness of the Soil Cleanup and Groundwater Cleanup on the Tapco site would be measured near the Rock River. The removal of contaminants from the groundwater would improve river quality and have a positive impact on the quality of the fish. On a larger scale, another important public health benefit of the Tapco Site Cleanup is tied to the economic benefits of the resulting mixed use development that would occur. These developments are likely to occur because of the Cleanup of the Tapco Site, the Depot Site and the Lorden/Eclipse Site and the major developments that would follow, starting with the construction of the Amtrak Station and the expected renovation of the Adjacent Amerock Building. The resulting economic development activity is expected to result in the reversal of the decline of population and housing quality within the Targeted Community. New housing construction, removal of the worst housing units and lead based paint abatement as part of housing renovation are all expected to occur. These positive housing developments should considerably lower the percentage of housing units with lead-based risk from the current level of 65.6%. In addition, the expansion of Davis Park to replace this Brownfield Site would be a catalytic project in the long-planned extension of the Rock River Recreation Path and Davis-Pec Path to the Amtrak Station and beyond. Rather than the “end” of the Rock River Recreation Path, it will become the new focus for future southern and western extensions of the Pathway System. This will further encourage non-motorized transportation as part of a lifestyle promoting personal health while reducing air emissions.

b) Economic Benefits and/or Green Space:

i) *Economic Benefits:* Without the City’s concern for the redevelopment of Brownfields within the Rock River corridor and the railroad corridors, and without the USEPA programs to assist with these redevelopment efforts, there is considerable evidence that these Brownfield areas would simply expand and intensify over time as more and more industrial buildings approach the end of their useful life. Instead, many buildings along the Rock River corridor and the rail corridors have

been acquired by the City or other public or private entities that have been working with the City of Rockford towards the phased redevelopment of these areas. Each of these plans include adaptive reuse or redevelopment of these areas to replace Brownfield properties with residences, retailers, offices, and public destination points, such as the future Amtrak station, all of which contribute to the tax base as these areas are revitalized. All include retail services for the surrounding community and job creation. Prevention of Brownfields, and prevention of existing Brownfields from expanding or intensifying, is extremely important to the surrounding neighborhoods which are already economically disadvantaged, as demonstrated in Section 1, Community Need.

The Northeast-Midwest Institute (NEMW) report on the Environmental and Economic Impacts of Brownfields Redevelopment states, “public investments in Brownfields leverage total investments at a ratio of approximately \$1/ public investment to \$8/ total investment...Brownfield sites in severely distressed areas require higher subsidy levels...” The potential for investment by the Rockford Park District for the expansion of Davis Park and major Pathway extensions and the potential for private developers to make major investments in the renovation of the adjacent 13 story 220,000 square foot Amerock Building, dramatically increases with the removal of the structurally unsound and seriously deteriorated Tapco Building and Cleanup of the Tapco site. This will set the stage for surrounding redevelopment for mixed uses, just as the development of the Amtrak Station three blocks south will be the catalytic project there. The potential for private investment surrounding the Tapco Site once this building demolition and Tapco Site Cleanup has occurred is considerable; the \$1 to \$8 ratio or better could be achieved. The Cleanup Grant for the Tapco Site would be a major economic catalyst for other public and private investments. The “South Main Revitalization Strategy”(The Lakota Group, September 2011), indicates a strong potential for redevelopment of properties adjacent to the Tapco Site with mixed use development including residential and retail. The major public investments being made to improve South Main Street and the Morgan Street and the development of the Amtrak Station in the near future are some of the key reasons for this development potential in the South Main Corridor where the Tapco site is located.

ii) Other non-economic benefits for sites to be used for green space: The City’s primary non-economic benefit goal within the Brownfield Program is to provide adaptive reuse and/or redevelopment of these Brownfield areas to include a major public open space component. Plans for the Tapco Site incorporate the City’s and Rockford Park District’s plans for the expansion of Davis Park on the Tapco Site. The expanded Davis Park would serve as a focal point for the long-planned continuous system of greenways and pathways along the Rock River and its major tributaries, including Kent Creek. The Rock River Recreational Path currently ends at Davis Park, but it is part of the pathway network that extends from Davis Park to the west edge of McHenry County, Illinois, 25 miles to the northeast. The Davis-Pec Path would extend from Davis Park west to tie in with the Pecatonica Prairie Path approximately 4 miles further west. Completion of the Davis- Pec Path would complete a major 60-mile section of the Grand Illinois Trail system, developed by the Illinois Department of Natural Resources .

The “Boone and Winnebago (Counties) Greenways Plan” (Greenways Plan) prepared by RMAP includes converting the Illinois Railway trestle over the Rock River to a pedestrian pathway, linking the east and west sides of the Rock River approximately 100 feet south of Davis Park. The City will soon take ownership of this trestle structure and the approaches. The section of the Davis-Pec Path connection to be constructed near the Tapco Site during redevelopment will link with this trestle pathway, as well as the existing Rock River Recreation Path that currently ends in Davis Park. This development will be completed using existing public right-of way, existing Rockford Park District

property and existing easements. It is anticipated that several of the pathways will be completed within the next few years. With this pathway system starting at Davis Park, pedestrians will easily access the future Amtrak Station on the Depot Site three blocks north of the Tapco site.

The City of Rockford is committed to including Green space and open space in urban redevelopment strategies for its Brownfields sites. The 2020 Plan for Rockford places an emphasis on smart growth techniques, which includes making a commitment to preserving the Green space that is available to the City and preventing the consumption of land on the City's fringe. Protecting and preserving the Rock River Corridor and its tributaries by providing an open space component in all Brownfield redevelopment proposals provides a major amenity to the redevelopment taking place in these Brownfield areas. The Tapco Site is an important focus of a much more extensive plan for pathways, open space and recreation. The .6 acre open space component of the Tapco Site will provide safe pedestrian and non-motorized transportation access to the Amtrak Station from several directions.

c) Environmental Benefits from Infrastructure Reuse/ Sustainable Reuse: The overall goals for Cleanup and Redevelopment of the Tapco Site for the expansion of Davis Park heavily emphasize the City's Goals for Infrastructure Reuse and Sustainable Development, reclaiming the Rock River Valley from riverfront industrial uses. The City will do everything it possibly can to sustain all aspects of the Tapco Site Cleanup and the Davis Park Expansion. Working with the Rockford Park District, these important goals will be incorporated into our redevelopment efforts both at the Tapco Site and in the surrounding area. A major component of infrastructure reuse will be improved public access to the Rock River, reuse of the nearby railroad trestle over the Rock River, and improved non-motorized and public transportation access between Davis Park, the future Amtrak Station, the east bank of the Rock River on the other side of the trestle and the core of Downtown, a little more than a half mile to the north and west. All public utilities and infrastructure at and near the Tapco Site will be better utilized with site cleanup and Davis Park expansion. Native landscaping will be restored after the Davis Park expansion is completed. The City and Rockford Park District will have several opportunities to develop storm water management and reuse innovations, including the ability to incorporate water quality improvements and water features into the site design for the Davis Park expansion . By providing an attractive and safe environment that encourages non-motorized transportation and public transportation as well as the use of the nearby future Amtrak service, the sustainability of this redevelopment will be optimized and the environmental benefits, including air and water quality, will be optimized.

Leveraging the EPA Brownfield Grant monies, RMAP has received a Sustainable Communities Grant from the EDA and "Preferred Sustainability Status" for the Region, including the City of Rockford.

Threshold Criteria for Cleanup Grant

1. Applicant Eligibility

Rockford is a municipal corporation formed by the authority of the State of Illinois. Rockford is eligible to apply for Cleanup Grants from the USEPA. The City of Rockford currently owns the Proposed Cleanup Site which is the former Tapco site located at 502 South Main Street and adjacent to Davis Park across Wyman Street. The City intends to perform remediation activities on this site; after which time the site will be redeveloped for mixed commercial and residential uses.

2. Letter from the State or Tribal Environmental Authority

The Letter from the Illinois Environmental Protection Agency is provided in Attachment A.

3. Site Eligibility and Property Ownership Eligibility

Site Eligibility

a. Basic Site Information

- (a) Name of the Site: Former Tapco Site
- (b) Address: 502 South Main Street, Rockford, Ill. 61101
- (c) Current Owner: The City of Rockford
- (d) Date of Ownership: The City of Rockford acquired this property on November 20, 2010.

b. Status and History of Contamination at the Site

- (a) Type of Contaminant: Hazardous Substances
- (b) Operational History and Current Uses: Tapco has been the site of several manufacturing operations within the large structure which has been vacant for the last 20 plus years and prior to the construction of the large structure.
- (c) Environmental Concerns: The environmental concerns for the former Tapco Site consist primarily of asbestos materials and lead-based paint inside the structure and, in the soils, lead, solvents and PNAs. Phase I and Phase II environmental site assessments (ESA) were conducted on this site. The Phase I indicated that the former industrial/manufacturing nature of the site and surroundings properties was an environmental concern. The Phase II ESA, completed in April of 2011, indicated metals (especially lead), solvents and PNAs were found in the soil and groundwater samples. An asbestos survey was conducted in January of 2011, and this survey revealed that asbestos remained in several areas within this large structure.

(d) Nature and Extent of the Contamination: This site became contaminated due to its historical industrial uses prior to the construction of the manufacturing facility and due to the age of the manufacturing facility, where lead based paint and asbestos containing materials were regularly used in the construction process. The building was found to contain lead-based paint and asbestos containing materials. Contaminants of concern in the soil exceed TACO Residential Soil and Groundwater Remediation Objectives. The primary contaminants of concern are lead, other metals, solvents and PNAs, specifically tetrachloroethylene, tetrochloroethene, trichloroethylene, trichloroethene, vinyl chloride, 2-methylnaphthalene, carbazole, lead, aluminum, antimony, iron, manganese, vanadium,

c. Sites Ineligible for Funding

(a) Listing on NPL: The site is not and is not proposed to be listed on the National Priorities List.

(b) CERCLA: The site 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

(c) United States Government: The site is not subject to the jurisdiction, custody, or control of the United States Government

d. Sites Requiring a Property-Specific Determination

The former Tapco Site does not require a Property-Specific Determination. This site is eligible for funding from the USEPA.

e. Environmental Assessment Required for Cleanup Proposals

A Phase I ESA was conducted on the properties during October of 2009 and again in September of 2010 just prior to City Acquisition on November 20, 2010. These Phase I ESAs conformed with ASTM E1527-05. A Phase II ESA was conducted on the property in April of 2011. The results of the Phase II investigation were summarized in a Phase II Report.

f. CERCLA 107 Liability The City of Rockford is not a potential liable party for contamination at this Site under CERCLA's bona fide prospective purchaser provision. The City has provided proof that this provision was met to the USEPA Region V Brownfield Division for previous grant opportunities, the FY2008 Assessment Grants, for the former Tapco manufacturing facility.

g. Enforcement Actions - The City is not aware of any enforcement actions for this property. The City of Rockford has enrolled the site into the Illinois EPA voluntary Site Remediation Program with the intent of receiving a No Further Remediation (NFR) letter for the property.

h. Information on Liability and Defenses/Protections

i) Information of Property Acquisition: The City of Rockford purchased the property on November 20, 2010 as a result of an effort to purchase Downtown and riverfront Brownfield sites to restore the Riverfront to Public Access and public park land. The previous owner was a private individual. The City is the sole owner of the property.

- Acquired Ownership: The City of Rockford Acquired Ownership by negotiated purchase from a private individual
- Date of Acquisition: The City of Rockford acquired the property on November 20, 2010 following the completion of a Phase I ESA
- Type of Ownership: The City of Rockford has fee-simple title to this property
- Previous Owner: Mr. John Cotton
- The City of Rockford had no familial, contractual, corporate or financial relationships with any prior owners or operators or potentially responsible parties

ii) Timing and /or Contribution Toward Hazardous Substance Disposal: Any disposal of hazardous substances occurred at the site prior to ownership by the City of Rockford. The City has not caused or contributed to any release of hazardous substances at the site. The City has not arranged and will not arrange to have hazardous substances disposed of or transported to the site.

iii) Pre-Purchase Inquiry: The City of Rockford performed a Phase I ESAs in accordance with ATSM E1527-00 in 2009 and on September 10, 2010 just prior to acquisition. They also conducted a Phase II ESA in April of 2011 all through the use of USEPA Brownfield Assessment Grants. The Phase I and Phase II ESAs were performed by Fehr-Graham and Associates, a regional engineering/environmental professional consulting firm.

iv) Post-Acquisition Users: The City of Rockford has not used this building or site.

v) Continuing Obligations – The City has installed a controlled access system so that no unauthorized persons have access to the property. This controls any illegal activities that may occur at abandoned facilities. The fencing part of this system also serves to keep pieces from the building from falling onto South Main Street or Cedar Street. The City has entered the property into the IEPA voluntary remediation program. The City has conducted Phase I and Phase II ESAs in accordance with both the USEPA Brownfield program and the IEPA Site Remediation Program to determine if there are any concerns to human health and the environment. This cleanup grant opportunity will facilitate the removal of asbestos from the structure and provide for Hot Spot Soil Excavation and/or Installation of an Engineered Barrier on the property so that the property may be redeveloped and the users of the site will be protected from hazardous substances. The City of Rockford will comply with all of the land use restrictions and institutional controls that are applicable to the property's remediation activities. The City will provide full access to the contractor's responsible for the remediation activities at the site. The City will comply will all information requests and administrative subpoenas that have or may be issued in connection with the property. Any legal notices required as part of remediation activities will be provided by the City of Rockford.

i) Petroleum Sites – This is a Hazardous Substance site.

4. Cleanup Authority and Oversight Structure

1. The City of Rockford will soon enter the site into the IEPA Site Remediation Program SRP. This is a voluntary based cleanup program for the State of Illinois. The City is preparing all of the documentation for the property and will submit this documentation for review and approval. After this documentation has been submitted and approved, the last remaining step under this program is the cleanup activities for the site. The City is preparing this grant application in the hopes of acquiring the necessary dollars to conduct cleanup activities for the site. Remedial action for the property will be carried out in accordance with the IEPA SRP as well as any City ordinances for construction or demolition and the Winnebago County Health Department. An environmental consultant will conduct cleanup oversight and will provide details of the cleanup activities. A Remedial Action Completion Report (RACR) will be submitted to the City of Rockford, to demonstrate that remediation has occurred, and to the IEPA in order for the site to receive a NFR.

2. The City of Rockford will not require access to adjacent properties to conduct either the asbestos or the soil cleanup; therefore, access to these properties is not a concern for the remediation activities.

F. Cost Share

The City of Rockford will provide for the 20% cost share of the \$200,000 cleanup grant through the use of programmatic expenses. The \$40,000 will be made up from:

- the labor hours of the Brownfield Coordinator for management and oversight of the cleanup activities.
- the City's public works department to prepare and solicit public bids for the remediation activities at the site and the management of these contractors.
- Legal fees in relation to cleanup activities and the filing and reviewing of the NFR. The review fees applied by the IEPA SRP to review and provide for the NFR will be paid by the City of Rockford.
- The Resolution committing the City to this local match is contained within Attachment iv.
- The Community Notice Documentation, summary of comments received, meeting notes and sign in sheet are provided in Attachment iv.