

## **DRAFT ACTION MEMORANDUM**

**ROCK STREET FRONTAGE OF BARBER-COLMAN  
MACHINE SHOP AREA OF BARBER-COLMAN  
RIVER STREET FRONTAGE OF BARBER-COLMAN**

### **I. PURPOSE**

**The purpose of this Action Memorandum is to document the City of Rockford's approval of the proposed environmental remediation including the removal of friable asbestos from several structures at the former Barber-Colman Manufacturing site in Rockford, Illinois. A non-time critical removal action will be conducted to remove friable asbestos from the Rock Street Frontage structures (Sections 5, 10 and 19), the Machine Shop Area (Sections 4, 9 and 16) and the River Street Frontage Area (Sections 7, 11, 12, 16 and 17. This action also includes the removal of non-friable asbestos if there are funds remaining in this program. These remediation activities are described in the Draft "City of Rockford Asbestos Abatement for Barber-Colman" which have been submitted under a separate cover.**

**The project will be financed using the U. S. Environmental Protection Agency (USEPA) Brownfield Cleanup Grant; Cooperative Agreement BF-00E38501. In addition, supplemental Brownfield Revolving Loan Funds up to \$200,000 may be required to complete the asbestos removal. The City of Rockford is acting as the Lead Agency for the remedial activities at the former Barber-Colman Manufacturing site. Asbestos removal activities will be initiated once the USEPA has granted approval to the City of Rockford.**

**The former Barber-Colman Manufacturing site is currently a USEPA Brownfield site owned by the City of Rockford. Future site plans include the redevelopment of this property into a Youth Sports Center with a mix of commercial and residential uses as ancillary activities as well as open space along the Rock River. It is anticipated that ownership of the open space portion of the former Barber-Colman Manufacturing site will be transferred to the Rockford Park District.**

**The removal of friable asbestos from the remaining 12 structures is the next step in the environmental remediation efforts at this large site. It should be noted that all of the structures within the Barber-Colman Manufacturing site were designated as historic in 2005. (See Attachment A-2, "Historic and Architectural Resources Survey Report, BARBER-COLMAN INDUSTRIAL COMPLEX and South Main Street Survey Area.") Based on information contained in this survey report, a National Register nomination was successfully prepared for the Barber-Colman site, with the result that it was listed on the National Register of Historic Places as the Barber-Colman Company Historic District on August 8, 2006. All structures on the site at that time were considered contributing structures in the District.**

**Some of the historic structures will be impacted by future Phase II Environmental Assessment activities and some are proposed to be demolished in future phases of the Barber-Colman redevelopment effort. The asbestos removal activities will be performed on all of the structures prior to additional assessment or demolition.**

**Extensive additional Phase II work will soon be performed to address remaining soil and groundwater contaminants from previous industrial site usage. These continued efforts are necessary under the Illinois Environmental Protection Agency (IEPA) Site Remediation Program (SRP) in order to prepare the site for commercial, recreational and residential usage. It is anticipated that the City of Rockford will utilize IEPA “River Edge” funding for additional soil or groundwater cleanup required bringing the entire site into compliance with IEPA Residential Standards.**

## **II. SITE CONDITION AND BACKGROUND**

### **A. Site Location and Description**

**The former Barber-Colman Manufacturing site address is 1200 South Rock Street in Rockford, Illinois, see Figure 1. The former Barber-Colman site occupies approximately 25 acres and is located in the east half of Section 27, Township 44 north, Range 1 east of the third principal meridian in Winnebago County. The “Rock Street Frontage,” “Machine Shop Area” and “River Street Frontage” sites described in the Brownfields Grant together comprise approximately 12 Acres and the majority of the intensely developed part of the site and 12 of the 13 remaining structures.**

**The Rock River runs along the eastern boundary of the property and is the closest major surface water body. The elevation of the property is approximately 710 to 720 feet above sea level. The general slope of the land is downward from west to east.**

**The Rock Street frontage includes buildings (Sections) 5, 10 and 19. Section 5 is the largest structure in the complex with six floors and 250,000 square feet of floor space. Section 5 is proposed to be adaptively reused as residential uses while Sections 10 and 19 are proposed to be demolished and replaced by new construction of multi-court gymnasium structures. The Rock Street Frontage is the westernmost area of the complex.**

**The Machine Shop area includes Section 4, the oldest remaining structure, Section 9 and Section 18. Sections 4 and 9 are proposed to be reused as ancillary uses to the Youth Sports Complex. Section 18 would be demolished and replaced by the multi-court gymnasium structures. The Machine Shop Area is located east of the Rock Street Frontage.**

**The River Street Frontage, located just east of the Machine Shop area, includes Section 7, 11, 12, 13, 16 and 17. Sections 7, 11, and 12 are proposed to be adaptively**

reused for ancillary uses to the Youth Sports Complex including cafeteria and restaurant spaces, athletic training facilities, offices/ administration areas etc. Sections 16 and 17 would be demolished to be replaced by multi-court gymnasium structures. Section 13 would be mothballed for the next few years until a suitable adaptive reuse is identified.

At the southeast corner of the Barber-Colman complex is the site of the former Invensys Metal Plating facility is located south and east of the east River Street Frontage area. Additional Phase II work is being performed at this site and additional Cleanup, if required, would utilize the IEPA River Edge Program funds.

### **Site History**

The former Barber-Colman Manufacturing site primarily consisted of residential use in the late 1800s. In the early 1900s, the Barber-Colman Company began constructing buildings for industrial use. Eventually, the site and surrounding property consisted of nineteen buildings in the manufacturing complex. Utility tunnels connected most of the buildings. In 1984, Reed Chatwood purchased the site as a location for business incubators, after the Barber-Colman Company closed its facilities. Reed Chatwood operated on the site for 15 years. A breakoff of the former Barber-Colman Company, known as Invensys, continued to operate a plating facility and heat treatment facility in buildings 14 and 15 respectively. Invensys stopped operations in 2002. In January of 2002, the City of Rockford purchased the entire site. During the summer of 2005, buildings 14 and 15 were demolished and soil treatment and removal was performed at the Invensys site. The remaining area of the site was not assessed in detail until 2006.

### **Site Environmental Conditions**

Wight and Company performed Phase II ESA work and an asbestos inspection of the structures contained within the Rock Street Frontage, Machine Shop area and River Street Frontage. Although Phase II Environmental Site Assessments (ESAs) for the Site along with a combined SIR/ROR/RAP were prepared, IEPA review determined that additional soil and groundwater sampling would be required. The asbestos, however, must be removed from the structures prior to adaptive reuse or demolition. Although additional soil and groundwater cleanup are anticipated for this site, the intent of this Action Memo is to document the work to be performed under the approved Cleanup Grant Cooperative Agreements for asbestos removal work.

### **B. Previous Response Actions**

Phase I and Phase II environmental site assessments have been conducted at the Barber-Colman Manufacturing site and the "Retail Area" properties bounded by Rock Street to the east, Lane Street to the south, Main Street to the west, and Loomis Street to the north. Remediation activities were conducted on the "Retail Area" properties and the southern portion of the former Barber-Colman site. This southern portion is known as the "Storage Area" and has been redeveloped into the Gray's IGA grocery store. No Further Remediation (NFR) letters have been issued

for the “Retail Area” and the “Storage Area”. The IEPA SRP issued the NFR letters. The remaining portions of the former Barber-Colman complex do not have NFR letters. Remediation activities were also conducted at the Invensys Metal Plating site as noted in Part A above.

### **C. State and Local Authority’s Roles**

The City of Rockford initiated environmental investigation activities on the former Barber-Colman Manufacturing site in 1999. An environmental consultant was retained by the City of Rockford after an award of the U.S. EPA Brownfield Assessment Pilot Grant in 1999. The environmental consultant was retained to conduct a brownfield inventory for the City of Rockford and to conduct Phase I and Phase II environmental site assessments on priority brownfield sites. The priority brownfield sites were identified through the Brownfield Advisory Committee and the City of Rockford. The City of Rockford also received a Brownfield Remediation Grant from the IEPA Brownfield Division. This grant was used to conduct the additional Phase II site investigation and prepare the required documentation for the former plating facility. The Brownfields Cleanup Revolving Loan Fund of \$500,000, originally awarded to the City during 2000, was used to The City received an additional U.S. EPA Brownfields Assessment Grants in 2003 and 2005 to conduct Phase I and Phase II environmental site investigations at the former Barber-Colman site and the surrounding area.

The City of Rockford has been involved in planning and approving the site redevelopment and in securing and administering funding for environmental response activities needed to prepare the site for reuse. The City has provided approximately \$300,000 in site assessment grant dollars to fund the investigation and prepare the site for remediation.

The IEPA has been involved in the environmental activities of the former Barber-Colman site through its SRP. The City of Rockford determined early on that a NFR letter was necessary for the redevelopment of the site. The SRP has reviewed the environmental documentation that has been prepared for the site. The IEPA has issued two NFR letters for the site.

The IEPA has also awarded the City of Rockford with a Brownfield Remediation Grant to conduct site investigation activities. The IEPA has awarded the City with \$240,000, a portion of which has been spent on the former Barber-Colman site.

The IEPA will continue to participate in the project in its role as approving authority and the issuance of the NFR letter. The City of Rockford will continue to participate in their role.

### **III THREATS TO PUBLIC HEALTH AND THE ENVIRONMENT**

The site investigations revealed that releases of hazardous substances occurred while the site was being used for industrial purposes. These hazardous substances,

**including various metals, VOCs, and SVOCs in the soil and groundwater, pose threats to the public health and the environment. Soil and groundwater samples were compared to the soil remediation objectives for residential properties.**

**This Action Memorandum however will focus on the proposed removal of all of the friable asbestos from the 12 structures and as much of the non-friable asbestos as possible within the constraints of the existing grant funding.**

#### **INSIDE BUILDINGS – ASBESTOS**

**Several friable and non-friable materials were identified in the buildings on site. The following friable materials were identified during the site survey as ACBM: 1) thermal surfacing insulation (TSI) on steam lines and fittings, 2) TSI on ductwork, 3) TSI on Fiberglass Insulation, 4) TSI on Drywall and 5) TSI on ceiling panels. In addition, the following non-friable materials are considered ACBM: twelve-inch by twelve-inch floor tile and mastic, linoleum, terrazzo, and transite siding.**

#### **IV. PROPOSED ACTIONS AND EXTIMATED COSTS**

##### **A. Proposed Response Activities**

**The ACBM will be removed by an abatement contractor licensed by the Illinois Department of Public Health. This abatement work will be conducted in compliance with all applicable local, state, and federal regulations. One final inspection will be completed once all the ACBM has been removed in order to confirm its removal.**

##### **ALTERNATIVE ANALYSIS**

**The No Action alternative was evaluated and rejected because the removal of friable asbestos must take place before a structure is demolished or reused for another use. Non-friable asbestos will be removed from structures that will remain and removed according to NESHAP and OSHA standards from the buildings being demolished. The no action alternative is unacceptable when considering that the City of Rockford must prepare this former manufacturing site for reuse and redevelopment. This cannot be accomplished without the removal of the friable asbestos.**

## B. Cost Analysis

A cost estimate was prepared for the above mentioned remedial activities. Table 1 shows the task item and cost estimates.

TABLE 1 – Cost Estimate

Task Item	Cost Estimate
<b>Friable Asbestos Removal and Disposal: Rock Street Frontage</b>	\$
<b>Friable Asbestos Removal: Machine Shop Area</b>	\$
<b>Friable Asbestos Removal: River Street Frontage</b>	\$
<b>Oversight/Inspection</b>	\$
<b>Non-Friable Asbestos removal</b>	\$
<b>TOTAL</b>	<b>\$600,000</b>

## Project Schedule

TASK	DATE
Action Memorandum Submitted and Approved	<b>March 2008</b>
<b>30-day comment period</b>	<b>April 2008</b>
<b>Commence Friable Asbestos Removal</b>	<b>April 2008</b>
<b>Complete Asbestos Removal as Disposal</b>	<b>May 2008</b>
<b>Inspections</b>	<b>June 2008</b>
<b>Completion Report</b>	<b>July 2008</b>

## V. DECISION TO PROCEED

The City of Rockford has considered all the factors presented in this Action Memorandum and has decided to proceed with the remediation activities necessary to redevelop the site. The USEPA Cleanup Grant funds obtained for these sites will be administered in accordance with Cooperative Agreement between the USEPA and the City of Rockford.

## VI. Attachments

- A. A-1 Site Map and A-2 “Historic and Architectural Resources Survey Report, BARBER-COLMAN INDUSTRIAL COMPLEX and South Main Street Survey Area.”
- B. Asbestos Surveys
- C. Grant Documents including the Grant Applications and Cooperative Agreement
- D. Community Relations Plan