

Appendix 1 - III.C Threshold Criteria for Cleanup Grants

III.C.1 Applicant Eligibility

III.C.1.a Eligible Entity

The City of West Chicago is an eligible entity, because it is an Illinois incorporated municipality as defined by 40 CFR Part 31.

III.C.1.b Site Ownership

The City of West Chicago is the current owner of the Site, acquiring six parcels since 2002 through the eminent domain process.

III.C.2 Letter from the State or Tribal Environmental Authority

A current letter of support from the Illinois Environmental Protection Agency (IEPA) was requested and will be included in **Attachment 2** to this Cleanup Grant application.

III.C.3 Site Eligibility and Property Ownership Eligibility

Site Eligibility

III.C.3.a Basic Site Information

(a) Name of Site: West Washington Street Redevelopment Project; 7.7 acres, 6 parcels (b) Address: 119 W Washington Street, West Chicago, IL 60185 and surrounding properties; (c) Current Owner: City of West Chicago; (d) not applicable.

III.C.3.b Status and History of Contamination at the Site

(a) The Site is contaminated by hazardous substances. (b) This property has had many historic operations that contaminated the Site. They include: multiple rail tracks and rail yard (1850s-1950s), freight depot (1912-1950s), lumber yard (1857-1969), gasoline station (1964-present), and the Geneva Iron & Metal Scrap Yard (mid-1950s until the mid-2000s). The following table summarizes historic and current uses of the Site:

Addresses	PIN Number	Historical Uses	Current Uses
111 W Washington St	04-09-201-019	lumber yard (1857-1969) rail spur, rail yard	vacant lot
119 W Washington St	04-04-414-001	rail yard, 7 car repair warehouses (1850s-1950s); laundry, freight depot (1912-1950s), lumber yard (1857-1969), Geneva Iron & Metal scrap yard and outbuildings (1950s-2000s)	vacant freight depot, Public Works road equipment storage in former scrap yard building; land littered with scrap
119 W Washington St	04-09-201-002	rail yard (1850s-1950s), scrap yard (1950s-2000s)	Public Works salt storage inside former scrap yard building; land littered with scrap
119 W Washington St	04-04-411-003	rail yard (1850s-1950s), scrap yard (1950s-2000s)	vacant land littered with scrap
119 W Washington St	04-04-411-001	rail yard (1850s-1950s), scrap yard (1950s-2000s), floodplain/wetlands	vacant land littered with scrap, floodplain/wetlands
139 W Washington St	04-09-201-018	former rail yard, watch tower; former Clark Oil & Refining gas station (c 1964)	Marathon gas station

(c) Environmental concerns were identified at the Site during a Phase II Environmental Site Assessment (ESA) conducted by URS Corporation in 2012 and 2013. This Phase II ESA identified

the following contaminants that exceeded the Illinois Environmental Protection Agency's (IEPA's) industrial/commercial soil remediation objectives:

1. heavy metals
2. semi-volatile organic compounds
3. polychlorinated biphenyls (PCBs)
4. isotopes of thorium and radium in surface soils, elevated gamma radiation levels in soil
5. elevated alpha radiation in groundwater

These contaminants are most likely the result of past Site operations, including railroads, railcar repair shops, lumber yard, the Geneva Iron & Metal scrap yard, and the thorium mill tailings, provided by the local Rare Earths Facility, for free to local businesses and residents for landscaping projects.

(d) A Phase I ESA was performed at the Site in 2012 by URS Corporation. A 2005 Phase I ESA was conducted at the scrap yard parcels only by Aires Consulting Group, Inc. The following table summarizes how the Site became contaminated and describes the nature & extent of contamination, and which areas were identified as recognized environmental conditions (RECs) or historical recognized environmental conditions (HRECs):

Table B Contaminants & Sources--West Washington Street Redevelopment Project			
Property	Contaminant	Source	RECs/HRECs?
111 W Washington Street	lumber yard operations	possible contaminants such as creosote, copper and heavy metals such as chromium and arsenic	REC
119 W Washington Street	scrap yard	radium in the groundwater and soil	REC
119 W Washington Street	scrap yard	piles of metal scrap, used tires, PCB-containing transformers, waste oil drums, above-ground tanks of diesel and gasoline, burned materials, metal slag, industrial waste materials (pellets), machinery for separating metal parts & debris	REC
119 W Washington Street	scrap yard	two highly-radioactive radium orphaned sources found in 2012 during Phase II ESA; associated with former scrap yard operations; disposal of radium sources by the Illinois Emergency Management Agency (IEMA) at offsite disposal facility	REC
119 W Washington Street	scrap yard	radioactive thorium fill (mill tailings) used by former scrap yard owner, dispersed across Site; thorium mill tailings removed by Kerr-McGee contractor in 2001; source of thorium mill tailings was the former Rare Earths Facility in West Chicago that provided tailings for free to local businesses and residents for landscaping projects	HREC
139 W Washington Street	gas station	gas station operating since 1964; Leaking Underground Storage Tank (LUST) in 1995 (IEMA #951160) and No Further Remediation letter issued in 1999	HREC
185 W Washington Street*	former Bolles Opera House*	laboratory used by Lindsey Light and Chemical Company (1930s-1960s) and Kerr-McGee (1960s-1970s) for extraction work related to rare earth and thorium ore processing, part of Manhattan Project. Building contaminated with mercury and radioactive materials; demolished in 1990s and sent to radioactive disposal facility in Utah	HREC

* Adjacent property, located 0.08 miles west-southwest of the Site

III.C.3.c Sites Ineligible for Funding

The West Washington Street Redevelopment Project is (a) not listed or proposed for listing on the National Priorities List; (b) not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA; and (c) not subject to the jurisdiction, custody, or control of the United States government.

III.C.3.d Sites Requiring a Property-Specific Determination

The West Washington Street Redevelopment Project is subject to a property-specific determination by the federal government or an authorized state because it meets the criteria listed in FAQ #A29 (1) *Properties subject to planned or ongoing removal action under CERCLA. It does not meet any of the other criteria (2) through (6) that are set forth in FAQ #A29.* The reason that the Site meets criteria (1) is based on the results of the August 2013 Phase II ESA conducted by URS Corporation, in which areas of elevated thorium and radium isotopes in shallow soils were identified at some parcels, that may be remnants of thorium mill tailings from Linsley Light and Chemical Company and Kerr-McGee operations, used as fill material, related to the former scrap yard and historic uses of the property.

The elevated areas of thorium and radium contamination were confirmed by additional soil sampling and surveying that was performed by IEMA personnel in September 2013. A total of 18 discrete samples were evaluated from URS' 13 sample locations; from the 13 sample locations, IEMA personnel collected 11 samples that were analyzed for Radium-228 (breakdown product of thorium) and Radium-226. The former scrap yard and surrounding properties were proposed for a gamma walkover survey in late 2013 and early 2014 by USEPA subcontractors in areas that were previously inaccessible (due to heavy brush/tree cover in the floodplain and wetlands). This gamma walkover survey was conducted in November 2013 and April 2014 and confirmed that there are areas at the Site with elevated Ra-228 and Ra-226 isotopes.

III.C.3.e Environmental Assessment Required for Cleanup Proposals

Environmental assessment has been performed at the Site. The Phase I ESA compliant with ASTM E1527-05 was completed February 10, 2012, for the West Washington Street Redevelopment Project. A Phase II ESA compliant with ASTM E1903-11 was completed for the West Washington Street Redevelopment Project in August 2013. URS Corporation of Chicago, Illinois completed both the Phase I ESA and Phase II ESA for the City of West Chicago.

Property Ownership Eligibility

III.C.3.f CERCLA §107 Liability

The City of West Chicago qualified as a local government entity that acquired the property through exercising its power of eminent domain. West Chicago is not potentially liable, or affiliated with any other person that is potentially liable for contamination at the West Washington Street Redevelopment Project under CERCLA §107, because the City was not the owner or operator of the Site at the time of treatment or disposal of hazardous substances, did not arrange for the treatment or disposal of hazardous substances, and wasn't a party that accepted hazardous substances for transport to disposal or treatment facilities at the Site.

The City of West Chicago obtained the six (6) parcels that make up the former rail yard, former lumber yard, gas station and the former Geneva Iron & Metal scrap yard through condemnation and the eminent domain process in 2009 and 2010 (see **Attachment 8**).

The City of West Chicago will meet its continuing obligations to maintain landowner liability protection by (1) complying with land use restrictions and institutional controls (the former scrap yard is fenced and is secured), (2) taking reasonable steps with respect to hazardous substance

releases; (3) providing full cooperation, assistance, and access to persons that are authorized to conduct response actions or natural resource restoration; (4) complying with information requests and administrative subpoenas; and (5) providing legally-required notices.

III.C.3.g Enforcement or Other Actions

Enforcement or Other Actions. There are no ongoing or anticipated environmental enforcement or other actions related to the West Washington Street Redevelopment Project. The City is not aware of any inquiries or orders from the federal or state government regarding the responsibility of any party for contamination or hazardous substances at the Site, including any liens.

III.C.3.h Information on Liability and Defenses/Protections

III.C.3.h.i Information on the Property Acquisition

The City of West Chicago is the current owner of the Site. The City of West Chicago has no history of familial, contractual, corporate, or financial of the properties that make relationships or affiliations with the Site's prior owners, operators, or potential responsible parties, up the West Washington Street Redevelopment Area. No onsite operations have been performed by the City or any entity since the City acquired the Site.

The following table summarizes the information on property acquisition:

Addresses	PIN Number	Previous Owner	Date Acquired	How Acquired
111 W Washington Street	04-09-201-019	Daniel Khoury & Jeffrey Purtell	2/25/2009	Eminent Domain
119 W Washington Street	04-04-414-001	Firstar Bank, Barney Jacobson, Washington St Ltd Partnership	4/7/2010	Eminent Domain
119 W Washington Street	04-09-201-002	Firstar Bank, Barney Jacobson, Washington St Ltd Partnership	4/7/2010	Eminent Domain
119 W Washington Street	04-04-411-003	Firstar Bank, Barney Jacobson, Washington St Ltd Partnership	4/7/2010	Eminent Domain
119 W Washington Street	04-04-411-001	Firstar Bank, Barney Jacobson, Washington St Ltd Partnership	4/7/2010	Eminent Domain
139 W Washington Street	04-09-201-018	Nilkath Varni, Inc.	11/8/2010	Eminent Domain

III.C.3.h.ii Timing and/or Contribution Toward Hazardous Substances Disposal

Disposal of all hazardous substances occurred before the City of West Chicago acquired the properties. The City did not cause or contribute to any release of hazardous substances at the Site. The City has not, at any time, arranged for disposal of hazardous substances at the Site, or transported any hazardous substances to the Site.

III.C.3.h.iii Pre-Purchase Inquiry

Environmental assessments performed at the Site include the following reports:

6. Phase I Environmental Site Assessment (ESA) for Geneva Iron & Metal Company, 119 West Washington Street, West Chicago, IL, completed March 2005 by the Aires Consulting Group, Inc. of Batavia and Peoria, Illinois.
7. Phase II ESA for Geneva Iron & Metal Company, entitled "BA Jacobson Parcel--6 acres, 119 West Washington Street, West Chicago, IL 60185," completed March 22, 2006 by Marlin Environmental Inc. of St. Charles, Illinois.
8. Phase I ESA for the City of West Chicago, compliant with ASTM E1527-05, dated February 10, 2012 by URS Corporation of Chicago, Illinois, "*Phase I Environmental Site Assessment,*

West Washington Redevelopment Area, 119 West Washington Street and Surrounding Properties, West Chicago, Illinois, 60185." 1335 pages.

9. Phase II ESA for the City of West Chicago, compliant with ASTM E1903-11, dated August 2013 by URS Corporation of Chicago, Illinois, "*Phase II Investigation for the West Washington Redevelopment Project, 119 West Washington Street and Vicinity, West Chicago, Illinois, 60185, DuPage County.*" 968 pages.

III.C.3.h.iv Post-Acquisition Uses

Since acquisition, the property and buildings are vacant, with the exception of the Marathon gas station retail building, which is currently leased (see **Table A** under **Section III.3.b** above). The former freight depot is vacant. Two former scrap yard buildings are vacant. The former laundry building and other small scrap yard outbuildings were demolished by the City in 2011, as the buildings were deemed unsafe. The former scrap yard is fenced and secured by a locked gate. The City has maintained the property by removing snow in winter and cutting grass at the former lumber yard.

III.C.3.h.v Continuing Obligations

Since acquiring the Site, the City has taken appropriate measures to ensure that the Site remains uncontaminated until redeveloped. The City has exercised appropriate care with respect to the Site, to ensure the safety of the public in the following ways:

- the City does not allow public access to the Site where hazardous substances have been identified
- no continuing releases exist
- the City is committed to preventing any threatened future releases, identifying any new releases and stopping them, if identified
- the City will ensure that remediation and construction activities follow an approved safety plan
- the City prevents any threatened future releases at the Site by limiting use of the Site until it is redeveloped
- the City will regulate future Site occupants through code enforcement and property owner education
- the City will work closely with the IEPA's regional office, IEMA, and DuPage County authorities to address any potential hazards or violations
- the City has and will continue to comply with all land use restrictions and institutional controls, including a potential Groundwater Use Ordinance
- the City's municipal code includes provisions for the proper disposal of all types of waste, including hazardous materials.
- the City has and will continue to provide access to the property to its environmental contractors, in order to complete cleanup at the property.
- the City has and will comply with all information requests and administrative subpoenas that have or may be issued in connection with the Site and will provide all legally-required public notices

III.C.3.i Petroleum Sites

III.C.3.i.i Current and Immediate Past Owners

Does Not Apply.

III.C.3.i.ii Acquisition of Site

Does Not Apply.

III.C.3.i.iii No Responsible Party for the Site

Does Not Apply.

III.C.3.i.iv Cleaned Up by a Person Not Potentially Liable

Does Not Apply.

III.C.3.i.v Relatively Low Risk

Does Not Apply.

III.C.3.i.vi Judgments, Orders, or Third Party Suits

Does Not Apply.

III.C.3.i.vii Subject to RCRA

Does Not Apply.

III.C.3.i.viii Financial Viability of Responsible Parties

Does Not Apply.

III.C.4 Cleanup Authority and Oversight Structure

III.C.4.a Cleanup Oversight

The Site will be enrolled in the Illinois EPA Site Remediation Program (SRP). The SRP provides oversight and approval of remedial activities at the Site. During the stages of the cleanup, the City will work with the SRP personnel to develop cleanup response activities that meet all state and federal health & safety standards. By participating in the Illinois SRP, the City will ensure that institutional controls and monitoring programs, if required, are maintained into the future.

III.C.4.b Access to Adjacent Properties

The Site is accessible by public roadways. Adjoining properties are accessible by public roadways, although no access to neighboring properties is anticipated to be necessary, in order to conduct cleanup or to perform confirmation sampling. If access by neighboring properties becomes necessary, the City will communicate with any property owners to ensure access is secured prior to any site work. Neighboring properties include the former West Chicago Park District Office (vacant), the boarded up Wiant historic home, an accounting firm, the former Park District's Fitness Station (vacant), an operating funeral home, Tastee-Freez drive-in restaurant (vacant, for sale), Canadian National railroad tracks (active), and private residences.

III.C.5 Cost Share

III.C.5.a Statutory Cost Share (See also Section IV.E of the guidelines on leveraging)

III.C.5.a.i Meet Required Cost Share

The twenty percent (20%) match will be met through the following: (1) West Chicago's Tax Increment Financing (TIF) funds, Downtown TIF District; (2) in-kind services from the Community Development Department for various grant activities, and (3) in-kind services from the City of West Chicago's Public Works Department for site preparation, and possible materials hauling activities. This match contribution by the City will be used for eligible and allowable activities, as approved by USEPA. A resolution by the City Council (December 1, 2014) will be presented, that will authorize the submittal of this grant and authorize the City to meet the match requirement.

III.C.5.a.ii Hardship Waiver

The City of West Chicago is not requesting a hardship waiver.

III.C.6 Community Notification

On November 26, 2014, the West Chicago community was provided with notice of the City's intent to apply for an USEPA brownfields cleanup grant, and was given ample time to review and comment on the draft grant proposal. This notification was provided on the City's webpage and through the local newspaper.

A draft Analysis of Brownfield Cleanup Alternatives (ABCA) was prepared and submitted as part of this proposal, which briefly summarizes information about the Site and contamination issues, cleanup standards, applicable laws, cleanup alternatives that have been considered, and the proposed cleanup plans. The draft ABCA also included information about the effectiveness of each alternative, the ballpark cost of the proposed cleanup alternatives, and the reasonableness of the cleanup alternatives that were considered, including the chosen one.

The City of West Chicago placed a notice of the December 4, 2014 Public Meeting in the *Daily Herald* (DATE), published an article in the *Daily Herald* (DATE), and posted a notice on the City's bilingual website (www.westchicago.org) on DATE. Also on DATE, the information about the posting of the draft grant proposal was published on a website link, that was in turn, tweeted, placed on an LED sign at Main Street and Highway 59, sent in an email blast to a subscriber database, and published in the *Daily Herald* and *TribLocal* websites. Articles about the draft grant application and December 4, 2014 Public Meeting was posted on www.mySuburbanLife.com on DATE.

Copies of the grant proposal including the draft ABCA, were made available for public review and comment at City Hall (475 Main Street, West Chicago, IL 60185) and on the City's website, www.westchicago.org beginning on November 26, 2014.

Attached to this Cleanup Grant application are the following:

1. The draft Analysis of Brownfield Cleanup Alternatives (ABCA) in **Attachment 6**
2. A copy of the West Chicago City Council's minutes of the December 1, 2014 meeting in which the proposal for USEPA cleanup grant funding was discussed and a resolution seeking authorization to pursue USEPA cleanup grant funding presented and passed, including authorization for the City to meet the 20% match requirement (**Attachment 5**)
3. The West Chicago City Council Resolution to pursue USEPA cleanup grant funding and to meet the 20% match requirement (**Attachment 5**)
4. A Daily Herald newspaper article and advertisement notifying the public of the City's intent to pursue funding and solicitation of comments at a December 4, 2014 Public Meeting (**Attachment 5**). An article from www.mySuburbanLife.com from DATE is also included in **Attachment 5**.
5. West Chicago's press releases issued to regional media outlets about the intent to pursue brownfields cleanup grant funding and a Public Meeting to solicit public comment and input (**Attachment 5**). Posted on the City's website is an announcement of the December 4, 2014 Public Meeting, including links to the draft cleanup grant proposal and draft ABCA (**Attachment 5**).
6. A summary of the Public Meeting held on December 4, 2014, including comments and questions/answers from the public (**Attachment 5**).
7. Sign-in sheets from the December 4, 2014 Public Meeting (**Attachment 5**).

Ranking Criteria for Cleanup Grants

V.B.1 Community Need (20 Total Points)

V.B.1.a Targeted Community and Brownfields (8 Points)

V.B.1.a.i Targeted Community

West Chicago is a community of 27,086 residents (2010 U.S. Census) with a history of serving the greater Chicago area as a major railroad hub since the 1850s. West Chicago was the location of Illinois' first railroad junction. The downtown business district was constructed around railroad tracks. Factories were given free land along the rail lines in the late 1880s. West Chicago was a bustling town in the early 1900s with many factories and industries built next to the rail lines. Today, the railroad tracks are mostly gone, but the historic downtown still remains, awaiting a transformation from serving its rail-dependent industries to a more diversified mixed-use downtown.

The West Washington Street Redevelopment Project, Area #1 (Site) is located in downtown West Chicago. Area #1 consists of 7.7 acres in 6 parcels that were used as a railroad yard, freight depot, laundry, rail car maintenance shops, lumber yard, iron and metal scrap yard, and a gas station. Today the Site includes unused, abandoned buildings and railroad lines that were used to transport lumber products to mills and manufacturing facilities, along with manufactured goods and milk to Chicago.

The targeted community includes West Chicago residents including those who live and work near the West Washington Street Redevelopment Project, in Census Tract 8415.01, the closest U.S. Census tract to the Site. The residents of Census Tract 8415.01 include a significantly high concentration of populations most sensitive to brownfield impacts (**Table 1**) including:

- *Young Children*--Census Tract 8415.01 is home to 623 children under age 5, or 10.5% of the population
- *Children*--Children under age 18 make up 31% of the population in Census Tract 8415.01
- *Pregnant Women*--Census Tract 8415.01 is home to 1441 women of child-bearing age, or 24.2% of residents
- *Minority Population*--Census Tract 8415.01 has 33.7% minority residents; in addition, 51.1% of West Chicago's population is Hispanic. Over 61% of Census Tract 8415.01's residents are Hispanic, four times higher than the concentration of Hispanics in DuPage County
- *Low-Income Population*--Approximately 1 in 7 people in Census Tract 8415.01 are living below the poverty rate, or 14.3% of the population

V.B.1.a.ii Demographic Information

West Chicago is located along the western edge of DuPage County, Illinois. Data from the 2010 U.S. Census indicate that DuPage County's population is 916,924, an increase of 1.4 percent from 2000. The City of West Chicago has a 2010 population of 27,086, an increase of 15.4 percent from 2000. Approximately 51% of West Chicago's 2010 population is Hispanic, and the number of Hispanics has increased by 17.5% from 2000 to 2010.

Table 1 summarizes the demographic information about the targeted community in comparison with data for DuPage County, State of Illinois, and the U.S. population:

Indicator	Targeted Community (Census Tract 8415.01)	DuPage County	State of Illinois	National
Population	5,510 ¹	916,924 ⁴	12,830,632 ¹	308,745,538 ¹
Unemployment	NA	6.9% ²	6.6% ²	6.7% ²
Poverty Rate	15.1% ³	6.6% ³	13.7% ³	11.8% ³

Indicator	Targeted Community (Census Tract 8415.01)	DuPage County	State of Illinois	National
Percent Minority	33.7% ¹	31.6% ⁴	38.5% ⁴	26.7% ¹
Median Household Income	\$62,344 ⁶	\$78,538 ³	\$56,853 ³	\$ 51,371 ³
Hispanic or Latino	61.5% ¹	13.8% ⁴	16.3% ⁴	16.9% ⁴

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 (January 2014)

³Data is from the 2012 American Community Survey and is available on American FactFinder at <http://factfinder2.census.gov/faces/nav/jsf/pages/index.xhtml>

⁴Data is from the USA QuickFacts, US Census Bureau, 2012, at <http://quickfacts.census.gov/qfd/states/00000.html>

⁵Data is from American Community Survey, 2007-2011, 5-year estimates at <http://factfinder2.census.gov>

⁶Data is from American Community Survey, 2005-2009, at <http://www.factfinder.census.gov>

Census Tract 8415.01 residents who are 25 years old and over have the following profile: Seventy-one percent are high school graduates; twenty-six percent have a bachelor's degree or more. From the American Community Survey study (referenced above), over forty percent of women aged 18-24 from Census Tract 8415.01 have less than a high school education; twenty-seven percent of men aged 18-24 have less than a high school education. DuPage County data for the same age range indicate that 9.1% of women and 11.1% of men have less than a high school education (2010 data). Thus, four times more women aged 18-24 in Census Tract 8415.01 do not graduate from high school as compared to women living in DuPage County. For men, the ratio is closer to 2.5 times more men aged 18-24 in the targeted community do not graduate from high school, compared to men living in DuPage County.

For Hispanic men, age 25 and over in West Chicago, 46.2% have less than a high school diploma. Of Hispanic women age 25 and over living in West Chicago, 55.2% have less than a high school diploma.

V.B.1.a.iii Brownfields

The Site to be cleaned up under this grant has had a history of industrial and commercial activities since the 1850s. This land today includes unused, abandoned buildings along with railroad tracks that were abandoned during the 1940s and 1950s that crossed the Site from north to south. From the 1950s until approximately 2010, four of the six parcels that make up the Site operated as the Geneva Iron & Metal Company scrap iron and steel salvage yard, with secondary smelting operations. These industrial operations are now closed, leaving aging buildings and environmental contamination. The contamination identified during the Phase II Environmental Site Assessment (ESA) include heavy metals, such as lead, chromium, nickel, mercury and arsenic, semi-volatile organic compounds, polychlorinated biphenyls (PCBs), and radioactive radium- and thorium-contaminated soils and materials.

In 2012 and 2013, Phase I and II ESAs identified contaminants above the Illinois' regulatory levels for industrial/commercial soil and groundwater exposure pathways. These soils need to be cleaned up before redevelopment can occur. The radioactive contaminants are related to thorium mill tailings provided for free to West Chicago businesses and residents from the 1930s until the 1950s by the local Rare Earths Facility (REF) operated by Lindsay Light Company. Later, the REF was operated by Kerr-McGee Chemical LLC. Areas of free fill (thorium mill tailings) at the West Washington Street Site were removed by Kerr-McGee in the mid-1990s as part of a removal action.

At the former scrap yard, elevated levels of PCBs were identified in subsurface soils in investigations conducted in 2006 and 2012. While operational, the scrap yard included piles of used transformers (the probable source of PCBs), piles of old tires, used oil drums, thorium metal tailings, and metal scrap along with aboveground tanks that stored diesel and gasoline. In 2012, a geophysical electromagnetic survey identified large areas of buried metallic objects remain at the scrap yard. Thirty-eight soil borings were advanced and 21 borings were converted into

groundwater monitoring wells. Soil and groundwater samples were collected and analyzed by a certified laboratory and indicated that subsurface contamination is present.

Contaminants in onsite soils include two highly-radioactive orphaned radium sources, thought to be a by-product of scrap yard operations. These contaminants were identified during a gamma radiation walkover survey at the former scrap yard in 2012. The two orphaned sources were handled and disposed offsite by the Illinois Emergency Management Agency (IEMA). Additional contaminated soil remains, awaiting remediation.

An adjacent facility located 0.08 miles west of the Site, the Bolles Opera House, was the site of a thorium-extraction laboratory operated by the Lindsay Light Company, later Kerr-McGee Chemical LLC from 1940 until the mid-1970s. Thorium ore was broken down into rare earth elements, including thorium, by using elemental mercury. Remediation of the exterior was performed by Kerr-McGee in 1984. The Bolles Opera House was demolished in 1997. In 2013, sampling of surface soils for radium-226 and radium-228 by IEMA indicated that Kerr-McGee type thorium tailings exist at the Site along with possible Bolles Opera House-type thorium contamination.

V.B.1.a.iv Cumulative Environmental Issues

West Chicago is a municipality that has dealt with multiple environmental issues for the past 39 years. In 1976, an unnamed person alerted the local newspaper to radioactive contamination at Reed-Kepler Park¹. In the 1980s, radioactive thorium mill tailings were identified throughout the City, at the wastewater treatment plant, along Kress Creek and the West Branch of the DuPage River, in addition to the wastes discovered at the former City landfill, Reed-Kepler Park. These locations became four Superfund sites:

- Kress Creek/West Branch DuPage River Site--now cleaned up
- Sewage Treatment Plant Site--now cleaned up
- Reed-Kepler Park Superfund Site--now cleaned up
- Residential Areas Superfund Site--still undergoing cleanup; one residence needs cleanup

These Superfund sites were the result of the disposal of radioactive thorium, radium, and uranium wastes produced at West Chicago's 43-acre Rare Earths Facility (REF) that operated from 1932 until 1973. The REF was operated by the Lindsay Light and Chemical Company, and its successors were the American Potash and Chemical Company, and later, Kerr-McGee. The REF produced thorium and rare earth compounds for use in producing incandescent mantles for lighting, luminous watch dials, and for use in the Manhattan Project during World War II. Leach ponds and waste tailings extracted from ores were piled at the REF, locally called "Mt. Thorium." Thorium mill tailings were provided free to businesses and residents as fill materials for landscaping projects from the 1930s through the 1950s. The mill tailings contained radionuclides, which are hazardous substances under Section 101(4) of CERCLA 42 USC §9601(14).

As of 2014, the REF site needs to be remediated. Unfortunately, the federal government did not allocate any funds to the Title X Reimbursement Program, so cleanup of the REF is on hold. In 2014, it was announced that the Federal Government reached an agreement with Anadarko Petroleum Corporation's Kerr-McGee unit for 5.15 billion dollars, for cleanup of thousands of sites across the country. It was stated that the West Chicago Kerr-McGee site would be one of these sites. Unfortunately, this is not the case, and Tronox Inc., the company spun off from Kerr-McGee in 2006, filed for bankruptcy in 2009. Tronox was responsible for cleanup of the one remaining Superfund Site, the Residential Areas Site.

Besides the presence of four Superfund sites, West Chicago also had a former W.R. Grace asbestos plant that is located 1.3 miles southwest of the Site. It operated as a vermiculite exfoliation plant from 1974 until 1996. At this location, vermiculite (asbestos) was shipped by rail from Libby,

Montana, unloaded in West Chicago and then "popped" or expanded by heating. This material was used to produce several kinds of building insulation and spray-applied fireproofing products. A report by the Agency for Toxic Substances and Disease Registry (ATSDR) in 2003 concluded that former West Chicago workers at this plant were exposed to hazardous levels of asbestos and that people who lived with former workers were probably also exposed to hazardous levels from fibers carried home on workers' hair and clothing.

Other environmental issues facing West Chicagoans include congested highways, high numbers of freight trains coming through town that stop traffic along West Washington Street, and foreclosed businesses and homes causing blight during the recent recession.

V.B.1.b Impacts on Targeted Community (5 Points)

Thorium has been linked to cancer, especially if it is inhaled. It is not known what the risks to human health are if the amounts of contamination are only trace amounts. Thorium does not pose an immediate public health risk, but cleanup is considered crucial by West Chicago and the USEPA. Almost 40 years and hundreds of millions of dollars have been spent on the four Superfund sites in West Chicago.

The impacts of thorium- and radium-contaminated fill materials, PCBs, heavy metals and other industrial contaminants present at the Site, are acutely felt by the most vulnerable population. The most vulnerable population includes young children, pregnant women, minorities, and low-income residents, all of which are represented in higher concentrations in Census Tract 8415.01 (Targeted Community) than in DuPage County or the State of Illinois.

The vulnerable population in Census Tract 8415.01 is significant. Children make up 31% of the population in Census Tract 8415.01, a 75% greater concentration of children under age 5 in comparison to DuPage County, Illinois, or the United States. Young children are more affected by the presence of industrial contaminants present at Area #1. Young children and workers are at greatest risk of exposure to heavy metals, such as lead, arsenic, chromium, arsenic, antimony, and mercury, all present at elevated levels at the Site. Some studies show that long-term exposure to arsenic in children may result in lower IQ scores. There is some evidence that exposure to arsenic in the womb and early childhood may increase mortality in young adults (ToxFAQs webpage, www.atsdr.cdc.gov).

In 1991, the Illinois Department of Public Health (IDPH) reported elevated cancer rates in West Chicago.¹ There was a greater than expected incidence of some cancers among West Chicago residents. From 1985 to 1988, the IDPH study found three times as many cases of melanoma among men than expected in a similar population. The incidence among women for lung cancer and among men for colorectal cancer were almost double the rates expected, the IDPH study found.

The Libby, Montana vermiculite factory workers throughout the United States have been well-studied by the Centers for Disease Control. These studies have shown a clear link exists between vermiculite workers' exposure to asbestos fibers and mortality from asbestos-related causes. Workers at the former W.R. Grace factory, 1.3 miles southwest of the Site, from 1974 until 1996 and their families and nearby residents that came into contact with vermiculite, waste products, and manufactured items are at a risk for developing lung cancer, mesothelioma, and asbestosis.

V.B.1.c Financial Need (7 Points)

V.B.1.c.i Economic Conditions (3 Points)

West Chicago had a 2010 population of 27,086 and 51.1% of the population is Hispanic. West Chicago is a community of few resources, suffers from depressed economic conditions, and does

not have other sources of funding. The Site is characterized as an area that has prolonged disinvestment and is in need of revitalization.

West Chicago has a per capita income of \$24,498 (2010 Census) which is 65% of the County average. Census Tract 8415.01 has a per capita income of \$22,705 which is 59% of the County average. Over 61% of residents in this Tract are Hispanic. Hispanic men and women in West Chicago have higher rates of having less than a high school diploma; 46-55% of Hispanic men and women over age 25 in West Chicago have less than a high school diploma.

On January 17, 2014, a West Chicago-based bank, the DuPage National Bank, a federally-insured bank, failed and was acquired by Republic Bank of Chicago.

This combination of depressed economic conditions, a high minority population, a poorly-educated workforce with less disposable income, along with living in an area historically contaminated with thorium, radium, and other industrial contaminants, has contributed to the physical decline of West Chicago.

V.B.1.c.ii Economic Effects of Brownfields (4 Points)

The demographic table (**Table 1** above) emphasizes West Chicago's current financial situation. It illustrates that West Chicago has significantly higher poverty and unemployment rates than DuPage County, the State of Illinois, or nationally. The per capita income for people living in Census Tract 8415.01 in 2010 dollars is less than the county, state, and national levels. West Chicago was harder hit by the recent economic recession, as seen by the unemployment numbers. West Chicago has higher numbers of adults without a high school education, which in turn affects the types of jobs they can hold, and their income earning potential. The key economic effects of having a higher unemployment rate, a higher proportion of residents living below the poverty line, and lower per capita income rates, all reduce West Chicago's effective tax base.

Brownfields, such as the West Washington Street Redevelopment Project Site, depress property values in the downtown area, and represent ongoing costs to the City to secure these vacant properties. The vacant, contaminated land could be remediated and redeveloped, offering potential jobs and business opportunities to West Chicagoans. Previous studies have demonstrated that the Site is an area characterized by aging and dilapidated vacant buildings, obsolete structures, located near three former Superfund sites and one active Superfund site, and lacks economic vitality.

V.B.2 Project Description and Feasibility of Success (30 Total Points)

V.B.2.a Project Description (15 Points)

V.B.2.a.i Existing Conditions (5 Points)

The Site is bounded by West Washington Street to the south, Fremont Street to the east, McConnell Avenue to the north, the Canadian National Railway (former Elgin, Joliet & Eastern Railroad) and Aurora Street to the west. The Site includes the former Geneva Iron & Metal scrap yard, neighboring gas station, vacant freight depot, and former lumber yard.

West Chicago conducted a Phase I ESA in 2012 at Area #1. A number of Recognized Environmental Conditions (RECs) were identified, which included the lumberyard operations, adjacent railcar maintenance shops, gas station operation over 50 years, and the former Geneva Iron & Metal scrap yard with secondary smelting operations, that operated at the former rail yard.

A Phase II ESA at Area #1 was conducted in 2012 and 2013. The Phase II report concluded that as a result of previous site operations, there have been releases of contaminants such as heavy metals, polychlorinated biphenyls, semi-volatile organic compounds, and radium- and thorium-contaminated soils and mill tailings, with possible lead paint, mold, and asbestos in the vacant buildings onsite.

Currently, the Site consists of four buildings onsite, a gas station retail store, a vacant freight depot building, and two former scrap yard buildings, used for salt storage and machinery storage. Reuse planning has occurred in the past few years. West Chicago considers cleanup of Area #1 as paramount in their effort to revitalize the heart of West Chicago, as it will provide an economic generator for the entire downtown area. West Chicago intends to redevelop the Site as a municipal campus with a new City Hall, as West Chicago intends to redevelop the Site into a municipal town center, with a new City Hall, village green, and residential and commercial/retail development.

V.B.2.a.ii Proposed Cleanup Plan (10 Points)

A USEPA cleanup grant will help to remediate this Site so that it can be redeveloped and improve the lives of residents living and working within the Targeted Community. The environmental contamination within Area #1 will be remediated in accordance with the Illinois Environmental Protection Agency (IEPA) Part 742 Tiered Approach to Corrective Action Objectives (TACO) Soil Remediation Objectives (ROs). The purpose of Part 742 is to establish soil cleanup standards for the remediation of soil contamination, which result in restoration of the environment to the extent practicable minimize the harmful effects to the air, land, and waters of the state, and are protective of public health, safety and welfare, and the environment.

Attachment 6 includes a draft Analysis of Brownfield Cleanup Alternatives (ABCA) that summarizes the evaluation of four remedial alternatives. West Chicago has chosen a combination of the Soil Excavation Alternative and the Engineered Barrier Alternative as its remedial strategy for remediation of Area #1.

West Chicago proposes to excavate soils with elevated radioactive radium and thorium isotopes. The remediation objective for cleanup is 7.2 picoCuries/gram, a level established by the USEPA for West Chicago. This cleanup level or remediation objective is a level set at 5 picoCuries/gram above the background level established for West Chicago. Engineered barriers and institutional controls will also be used as a soil remedy under IEPA TACO Part 742.1100. Soil capping or a soil performance standard is considered an engineered control that is kept in-place, operated and maintained, until the lowest concentration that is practicable can be achieved, so that residual contaminants left in the soil do not pose a threat to public health, safety and welfare, or the environment.

If additional radioactive orphaned sources are identified during excavation, then West Chicago will notify the Illinois Emergency Management Agency (IEMA) for assistance in removing an orphaned source, such as was done in late 2012 during performance of the Phase II ESA, when IEMA came and removed the source and nearby soils for offsite disposal.

V.B.2.b Task Description and Budget Table (10 Points)

Task Descriptions

This grant will fund a large portion of the remediation costs required to procure a No Further Remediation (NFR) letter for Area #1 of the West Washington Street Redevelopment Project. The project tasks are divided into the following categories: (1) Eligible Programmatic Tasks, (2) Illinois EPA Site Remediation Program oversight of remediation activities and reports, (3) Site Cleanup including soil removal, and (4) In-Kind Services. The total budget for cleanup of Area #1 is \$240,000, which includes USEPA Brownfields grant funds and the 20% required match by West Chicago. A description of each task is presented in **Table 2**.

Task 1: Eligible Programmatic Expenses: Activities in this task include coordination with DuPage County officials, the Illinois Emergency Management Agency (IEMA), and USEPA and costs of quarterly reporting. West Chicago's cost share for this task is \$9,850 and contractual costs are \$10,000 for a total of \$19,850.

Task 2: Illinois EPA Site Remediation Program: West Chicago will be enrolling the Site into the Illinois EPA's Site Remediation Program (SRP). This budget category will be used to prepare reports for the IEPA and to reimburse the IEPA for their oversight of the remedial activities at Area #1 in pursuit of a final No Further Remediation (NFR) letter. Costs for the IEPA SRP personnel are estimated at \$125 per hour for 60 hours, for a total of \$7,500.

Task 3: Site Cleanup: This task includes finalization of the Analysis of Brownfields Cleanup Alternatives and associated documents, notifying the public of ongoing site activities and planning meetings, preparation of bid specifications consistent with the remedial action plan, costs associated with remediation, including sampling and analysis after the excavation, and oversight of cleanup activities by a qualified environmental consultant. The total quantity of soil that will need to be remediated is not known and will be dependent upon the location of each building along with the planned depth. For cost-estimating purposes, soil disposal costs of \$112,500, analytical costs of \$30,000, and personnel costs (\$120/hour) of \$37,500 are assumed.

Task 4: In-Kind Services: West Chicago will provide in-kind services that may include work performed by the Public Works Department to move materials, remove brush to provide access to the wetland areas, and other tasks to expedite remediation. The in-kind services may also include work by the Community Development Department personnel, along with supply costs associated with the cleanup plans, community involvement plans and submittal of cleanup completion reports to the IEPA.

Table 2 Budget Table

Budget Categories	Project Tasks						Total
	Task 1: Eligible Programmatic Costs	Task 2: IEPA SRP	Task 3: Site Cleanup	Task 4: In-Kind Services	Task 5	Task 6	
(programmatic costs only)							
Personnel	\$8,000	\$500	\$8,000	\$11,800			\$28,300
Fringe Benefits	\$600	\$400	\$400	\$800			\$2,200
Travel ¹	\$1,000	\$0	\$0	\$0			\$1,000
Equipment ²	\$0	\$0	\$0	\$0			\$0
Supplies	\$250	\$250	\$250	\$250			\$1,000
Contractual	\$10,000	\$10,000	\$180,000	\$0			\$200,000
Other --IL EPA's Site Remediation Program (SRP)	\$0	\$7,500	\$0	\$0			\$7,500
Total Federal Funding (Not to exceed \$200,000)	\$10,000	\$10,000	\$180,000	\$0			\$200,000
Cost Share ³	\$9,850	\$8,650	\$8,650	\$12,850			\$40,000
Total Budget	\$19,850	\$18,650	\$188,650	\$12,850	0	0	\$240,000

¹Travel to brownfields-related training conferences is an acceptable use of these funds. The 2015 Brownfields Conference will be in Chicago; \$1000 estimated for registration fee, 2 nights' lodging, food and travel expenses.

²EPA 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. Generally, equipment is not required for assessment grants.

³Applicant must include the cost share in the budget even if applying for a cost share waiver. If the applicant is successful and the cost share waiver is approved, it will be removed in pre-award negotiation.

V.B.2.c Ability to Leverage (5 Points)

West Chicago has received letters of support from various community organizations that are committed to site cleanup/remediation and redeveloping the property. †Staff or volunteer time from these organizations will be provided for the following services:

- **DuPage County** has offered staff assistance in the following areas: †participation in planning meetings and by providing outreach and educational assistance concerning human health and vast environmental improvement.

- *Friends of the West Chicago City Museum* will partner with West Chicago to plan and fundraise for placement of outdoor history signboards for visitors to the area that would be placed in the new municipal campus with historical images including Chicago & Northwestern Railroad history.
- *Friends of the West Chicago City Museum* will organize and fund programming that will be held in the new "town square" that may include school tours, historical-themed music concerts, and walking tours of the entire historic downtown.
- *West Chicago Community Center, Inc.* will help the City by scheduling and holding public meetings, open houses, and other events at the historic Wiant home, 151 West Washington Street, which it is currently renovating. *This is an approximate in-kind donation of \$2,000.*
- *West Chicago Community Center, Inc.* will aid the City with promotional efforts concerning the redevelopment project, including publicity and announcements. *This is an in-kind donation of staff time of approximately \$1,000.*
- *West Chicago Community Center, Inc.* has offered to participate in a redevelopment commission with the City, in order to help plan and redevelop the West Washington Street Redevelopment Project area. †*This translates into \$3,000 of in-kind donation for the staff time spent participating in these activities.*
- *West Chicago Park District* will collaborate with West Chicago in order to provide services and activities for the community in the new public "village green" -style open space.
- *West Chicago Park District* will work with the City to use the open space, space in the new City Hall and renovated freight depot building (if possible) for fitness classes and other organized activities in support of a new Community Wellness Program promoted by Mayor Ruben Pineda.
- *West Chicago Park District* will work with the City to create and install a new climb-on, hands-on outdoor sculpture in an open space, to promote physical fitness and movement.
- *Western DuPage Chamber of Commerce* will hold business forums, social gatherings and networking events to promote businesses in the community to reach out to local residents and other businesses. The Chamber will work with the City on planning for financing of the redevelopment and on development recruitment. †*This in-kind donation of 400 hours (over 3 years' time) is worth approximately \$14,000.*
- *Western DuPage Chamber of Commerce* will assist the City to initiate a business startup or incubation program in the new commercial space, and serve on planning committees; assuming 12 meetings totaling 36 hours over 3 years, *for an in-kind donation of \$1,260.*

West Chicago remains committed to redeveloping the Site once it is cleaned up. †West Chicago will pursue all avenues for possible additional funds, which may include tools designed to provide for retention, expansion, and recruitment of businesses to the community. These tools include: TIF, DuPage County Property Tax Incentives, sales tax sharing, and those powers available to a home-rule community. †Additional potential tools may include: †State of Illinois Economic Development Grants, HUD Community Development Block Grants, Private Foundation grants, Small Business Loans, Economic Development Administration funding, and Enterprise Community Grants.

V.B.3 Community Engagement and Partnerships (15 Total Points)

V.B.3.a Plan for Involving Targeted Community and Other Stakeholders and Communicating Project Progress (5 Points)

Community Engagement

The City of West Chicago has had a high level of community engagement. †Local homeowners have had direct involvement with federal and state investigators and contractors sampling soils, performing gamma logs of soil borings and collecting data on their properties. †The people of

West Chicago are well aware of the impacts caused by environmental contamination and are supportive of a plan to redevelop the dilapidated former industrial area, Area #1 of the West Washington Street Redevelopment Project. The community supports transforming this vacant, former scrap yard, lumber yard and gas station into a new municipal campus with a City Hall and pedestrian-friendly environment, greenspace, and new mixed commercial/retail development. †

Public Groups/Community Involvement

West Chicago's support for this project is evident by the community involvement by different citizen groups. Neighborhood groups, homeowners organizations, churches, arts groups, the local Park District, and Community Center †are aware of and will be †involved with the planning and implementation of this cleanup project.

Public Meetings/Public Media

Community groups will be notified of upcoming public planning meetings via the City's bilingual website and local newspaper (*Daily Herald, TribLocal*) and through an email blast by the City to a subscriber database. †Additionally, letters and emails to local community groups can be made, and notices can be placed via the City's online blog, tweeted by the City and placed on an LED sign on Main Street and Highway 59.

The draft grant application, including the draft ABCA, was posted to the City's website (<http://westchicago.org>) on November 26, 2014. The Public Meeting for this USEPA Cleanup Grant Application, is scheduled for December 4, 2014. †The draft grant application is available for public review online, and the public is invited to comment via email or US Mail to Mr. John Said, Director of Community Development for West Chicago. †Meeting notes from the Public Meeting along with a sign-in sheet will be provided in **Attachment 5**. Progress in cleaning up this Site will be milestone and documented on the City's bilingual website.

The West Chicago City Council will consider a Resolution on December 1, 2014 in support of this Brownfields Cleanup Grant application, and authorize the 20% match provision, for the West Washington Street Redevelopment Project. A copy of the passed Resolution will be included in **Attachment 5**.

Sensitive Population Concerns

The City will identify potential sensitive populations that will be affected by the remediation and redevelopment of this Site. The sensitive population will include school children that live near the Site, walking to and from schools along West Washington Street and along the Prairie Path bike path east of the Site. The City will work with the local health department to ensure the safety of sensitive populations during soil remediation activities.

The City will seek out and consider local resident concerns and discuss these concerns at public meetings held at strategic times during the planned remediation. †In this way, the City will involve the targeted community, involve community groups in planning and implementation of the remediation and redevelopment, and communicate progress of the project.

V.B.3.b Partnerships with Government Agencies (5 Points)

West Chicago has a history of successfully managing federal funds, and satisfactory compliance with grant requirements, including work plans, schedules, and terms and conditions. †The City has not received an USEPA Brownfields grant, but has received other federal and/or non-federal assistance agreements.

West Chicago has successfully managed federal funds from the USEPA, as well as Housing and Urban Development (HUD), Department of Transportation (DOT) and Historic Preservation funds that are administered through the State of Illinois under Federal guidelines. West Chicago views

Brownfields as just one component of their overall redevelopment plans. The City has and will continue to coordinate with the IEPA, IEMA, and USEPA on Brownfields projects and to address environmental issues. The City coordinates construction projects with the IEPA by obtaining water and sanitary main permits.

West Chicago has coordinated its redevelopment efforts with DuPage County Department of Environmental Concerns to identify the impact redevelopment would have on special management areas within the project Site. The City also uses the resources of the DuPage County Health Department for any required well and septic permits, and coordinates plan reviews with the Health Department. †The City believes in leveraging the resources of all the agencies in order to redevelop Brownfields sites.

V.B.3.c Partnerships with Community Organizations (5 Points)

A number of community partners have been involved with and support the West Washington Street Redevelopment Project. They include:

Table 3 Community Organizations	
Organization	Role
DuPage County	Supports remediation & redevelopment of property that will provide new businesses and housing consistent with the County's Strategic Plan. †County to provide assistance in planning meetings, outreach and educational assistance
DuPage County Health Department	Supports the City's grant to improve environmental health, wellness and livable community standards; www.dupagehealth.org
Friends of the West Chicago City Museum	Supports redevelopment plans and revitalization of the downtown
People Made Visible	Promotes community events including art, music, dance, local gardening, & community bulletin board provider; http://peoplemadevisible.com
Prestonfield Homeowners Association	Homeowners' Association for development near the Site that has 215 members; supportive of redevelopment and future growth of West Chicago
West Chicago Community Center, Inc.	Currently renovating nearby historic Wiant House; helping City by scheduling and holding public meetings regarding planned redevelopment; participation in redevelopment commission; help with promotional efforts, including publicity and announcements
West Chicago Fire Protection District	Located north of Project Site, at 200 Fremont Street; www.wegofpd.org
West Chicago Park District	Supporter & partner with the City to provide recreational and educational programming; will support Community Wellness Program, install new climb-on, hands-on outdoor sculpture in new municipal campus, promote physical fitness; http://we-goparks.org
Western DuPage Chamber of Commerce	Supporter of downtown revitalization plans and works for improving economic conditions in West Chicago, including drawing new businesses to the community; www.westerndupagechamber.com

V.B.4 Project Benefits (20 Total Points)

V.B.4.a Health and/or Welfare and Environment (10 Points)

V.B.4.a.i Health and/or Welfare Benefits (5 Points)

Brownfields in West Chicago have substantial impacts on the health and welfare of residents living in Census Tract 8415.01 and in West Chicago. Specific impacts include:

- *Ingestion/Inhalation of Contaminated Material.* Contact with contaminated soils through ingestion or inhalation poses a threat to children, especially young children.
- *Neighborhood Safety and Disinvestment.* The Site consists of open land where buildings once stood, along with abandoned buildings, which has led to disinvestment and decline of the Turner Junction Historic District. The former Geneva Iron & Metal scrap yard property is littered with metal scrap and debris; that area is secured with a gate and fencing.

- **Resident Health.** The health concerns of minority and low-income residents are a serious issue since Census Tract 8415.01 includes a higher concentration of minority, Hispanic and low-income residents than the City or County as a whole.

Table 3 shows health risks associated with contaminants identified at the Site during the 2013 Phase II Environmental Site Assessment. Each of the major organ systems listed are potentially impacted by the contaminants found at the Site, a number of which are carcinogens. Heavy metals can cause possible health impacts including acute and chronic impacts to bodily organs, impaired neurological development in children, impacts to nervous systems and cancer. Radioactive thorium- and radium-ill materials produce alpha and beta particles and gamma radiation. If thorium-contaminated soils are inhaled, there is an increased risk of cancers of the lung, pancreas and blood. If ingested, liver diseases are possible.

Other contaminants are *anticipated* to be identified as carcinogens by the USEPA and the International Agency for Research on Cancer (IARC) and are indicated on Table 3 with an "A". Contaminants anticipated to be carcinogens include benzo(a)anthracene and benzo(a)pyrene, polychlorinated biphenyls and lead. Benzo(a)anthracene and benzo(a)pyrene are both semi-volatile organic compounds that are formed during the incomplete burning of coal, oil and gas, garbage or other organic substances. They are found in coal tar, crude oil, creosote and roofing tar. Polychlorinated biphenyls can cause skin conditions such as acne and rashes; changes to blood and urine may indicate liver damage. Anemia, liver, stomach and thyroid gland injuries are possible health impacts from exposure to PCBs. Immune system changes, behavioral alterations and impaired reproduction are also possible side effects to PCB exposure. Lead poisoning is a leading environmentally-induced illness in children, because they undergo rapid neurological and physical development. Exposure to elevated lead may result in damage to blood-forming, nervous, urinary and reproductive systems. Mercury has been identified as a *possible* human carcinogen, which is indicated on Table 3 with a "P".

Table 4: Health Risks from West Washington Street Redevelopment Site-Area #11

	Benzo(a)anthracene and Benzo(a)pyrene	Radium and Thorium radioactive isotopes	PCBs	Antimony	Arsenic	Chromium	Lead	Mercury	Nickel
Carcinogen? ²	A	Y	A	N	Y	Y	A	P	Y
<i>Target Organs</i>									
<i>Cardiovascular</i>				X			X		X
<i>Dermal</i>	X		X		X				X
<i>Developmental</i>			X				X	X	
<i>Endocrine</i>			X						
<i>Gastrological</i>					X		X	X	
<i>Hematological/</i>		X					X		
<i>Hepatic</i>	X	X	X		X				
<i>immunological</i>	X		X			X			X
<i>Musculoskeletal</i>		X					X		
<i>Neurological</i>			X		X		X	X	
<i>Ocular</i>							X	X	
<i>Renal</i>						X	X	X	
<i>Reproductive</i>							X		
<i>Respiratory</i>		X		X	X	X			X

1 Contaminants listed were identified in Phase II Environmental Site Assessment (2013) of the West Washington Street Redevelopment Project Site, West Chicago, IL, performed by URS Corporation

2 Health Risks from Agency for Toxic Substances and Disease Registry (ATSDR), www.atsdr.cdc.gov/toxfaq.html and www.osha.gov/SLTC/lead

A=Anticipated to be a human carcinogen (USEPA and International Agency for Research on Cancer (IARC) P=Possible human carcinogen (USEPA); Y=Yes; N=No

V.B.4.a.ii Environmental Benefits (5 Points)

Brownfields in West Chicago have substantial impacts on the environment. Specific impacts include:

- *Impacts to Groundwater.* Groundwater at Area #1 has heavy metals including manganese, iron, and lead that exceed Illinois' Remediation Objectives.
- *Impacts to Surface Water.* The site includes delineated wetlands and a floodplain on the western portion of the site which was part of the Geneva Iron & Metal scrap yard parcels. Surface water runoff from the scrap yard and rail yard and surrounding industries may have impacted the wetlands/floodplain.

V.B.4.b Environmental Benefits from Infrastructure Reuse/Sustainable Reuse (5 Points)

V.B.4.b.i Planning, Policies or Other Tools (2 points)

One of the stated goals for the planned municipal campus is to serve as a model for urban sustainability. Reuse options are currently under consideration with a goal of sustainable redevelopment. The former freight depot is under consideration for reuse, as are the buildings remaining at the former scrap yard. Ideas for the final City Hall design include features such as stormwater recycling for irrigation, a green roof, or a rainwater collection system of cisterns, permeable pavement and LEED-certification. The nearby Metra station provides an urban transit component and allows people to easily access the downtown areas including the Site, on foot.

The numerous environmental benefits of redevelopment of this brownfields site include preventing pollution, through the use of engineered barriers, source removal, and zoning and municipal codes. The City wishes to prevent creating future brownfields through sustainable redevelopment, and to be mindful of keeping "waste" materials out of landfills. For example, when site buildings undergo demolition the City will salvage useable materials to reuse as fill, bank stabilization, etc. The City encourages reducing the use of resources. The design of the municipal campus will encourage pedestrian walking and bicycle transport, connecting to the existing Prairie Path hiking & biking trails. The design of the new campus will serve as a model for public spaces that encourage physical activity and community gardens.

Example of Efforts - West Chicago has taken proactive steps to revitalize the City over the past few years. In 1990, West Chicago obtained approval from the State of Illinois for a Tax Increment Financing (TIF) District within the downtown area to further aid in its redevelopment and revitalization. An extension was received in 2013 for this TIF District for an additional 12 years, to 2025.

In 2006, West Chicago conducted a Facility Needs Assessment Study to determine a location for City Hall, having outgrown the renovated former grocery store used since 1975. The study narrowed down sites throughout the community and concluded that the best location for a new City Hall would be within the downtown area, in part to serve as an economic generator for downtown redevelopment. The selected site on West Washington Street would allow for the creation of a municipal campus containing a new City Hall and green space for community events that would be in close proximity to the existing library and fire station

In 2007 West Chicago residents and elected officials approved the Central Main Street Redevelopment Plan detailing a Master Plan that would create a link between the preservation and enhancement of the Turner Junction Historic District as well as the redevelopment of the area of the planned municipal campus. The Redevelopment Plan included the area for a new municipal campus and retail redevelopment of the area, including West Washington Street and Main Street, which intersects West Washington Street to the east.

In 2011, the City hired a consultant to assist with the West Washington Street Redevelopment Project, with the main tasks including the development of a conceptual Site plan for a municipal campus and the rest of the Site, and to advise the City on project implementation.

Based on the approved 2007 Redevelopment Plan the City concluded that it needed to acquire parcels through the condemnation and eminent domain process. It acquired the former lumber yard in 2009, the former scrap yard parcels in April 2010, and the gas station in November 2010. Ordinance No. 08-0-0030 authorized the City to acquire the former lumber yard via eminent domain and the condemnation process, passed on April 21, 2008. Ordinance No. 07-0-0030 authorized the City on March 19, 2007 to acquire the former Geneva Iron & Metal Co. scrap yard parcels. The gas station parcel was obtained via eminent domain in a similar process, after approval from the West Chicago City Council in Ordinance No. 09-0-Council Ordinances are presented in **Attachment 8**.

V.B.4.b.ii Integrating Equitable Development or Livability Principles (3 points)

West Chicago has a number of revitalization efforts underway to address these principles. The goals and objectives in revitalizing the downtown are to renew land uses, promote economic growth, create public spaces, establish a pedestrian-friendly environment, and enhance the area's aesthetic character. The expected outcomes of this brownfields grant will be increased numbers of new jobs, 7.7 acres of land for reuse/greenspace for a new municipal campus, and minimization of exposure to hazardous substances.

V.B.4.c Economic and Community Benefits (5 Points)

V.B.4.c.ii Job Creation Potential: Partnerships with Workforce Development Programs (2 Points)

The proposed cleanup and redevelopment of the Site will create a number of jobs based on the preliminary estimates and planning that have occurred. We estimate that 100 permanent jobs may be created, based on the speculated variety of uses for the Site. Temporary jobs in the construction field may employ 50-100 workers. Retail and mixed commercial businesses could employ residents in a variety of jobs; a few onsite restaurants may hire food servers, cooks, dishwashers, and cashiers; mixed commercial/retail establishments may employ sales assistants, clerks, administrative assistants, bookkeepers, and receptionists; professionals associated with insurance, law, accounting, or other fields, may open offices at the Site. A possible assisted living residence would employ caregivers, therapists, food service personnel, custodial workers, managers and nurses. Exterior maintenance and landscaping contractors may also be employed at the new City Hall and municipal campus.

West Chicago does not have a job training center but is served by the Illinois Department of Employment Security (IDES) offices located in Elgin (7 miles), North Aurora (8 miles) and Lombard (11 miles) from West Chicago. The workNet DuPage Career Center an Illinois workNet Center, is located in Lisle, IL, about 13 miles SE of West Chicago.

V.B.4.c.i Economic or Other Benefits (3 Points)

West Chicago has a number of revitalization efforts underway to address the declining industrial and commercial base. The goals and objectives in revitalizing the downtown are to renew land uses, promote economic growth, create public spaces, establish a pedestrian-friendly environment, and enhance the area's aesthetic character. The expected outcomes of this brownfields grant will be increased numbers of new jobs, 7.7 acres of land for reuse/greenspace for a new municipal campus, and minimization of exposure to hazardous substances.

The project site is a brownfield in an area zoned B-1, central business district. Studies of parks and civic campuses developed in similar cities have showed improved property values and an expanded tax base through redevelopment of blighted areas. Research also links property values with

proximity of greenspace. The City has every expectation that the Site will inject new life into the area, and stimulate private investment dollars into the downtown area. The City's investment in this area will leverage developers to capitalize on the new City Hall, greenspace, and walking trails, connectivity to Main Street, and a municipal campus within walking distance of the Metra commuter rail station. As developers are drawn to the area, the City and its residents will benefit from increased tax revenues, property values, and employment opportunities. Greenspace aids in improved stormwater quality and quantity management, and contributes to the offset of heat island effects, and provides room for civic events.

V.B.5 Programmatic Capability and Past Performance (20 Total Points)

V.B.5.a Programmatic Capability (12 points)

The City of West Chicago will manage the USEPA Cleanup Grant and will select and manage a consultant team experienced in site remediation and planning. Mr. John D. Said, AICP, the Director of Community Development for the City of West Chicago, will oversee daily activities on behalf of the City. †These daily activities will include:

- planning and zoning
- code enforcement
- commercial and residential permitting
- economic development

Mr. Said will oversee the remediation of onsite soils that are contaminated with heavy metals, SVOCs, PCBs and radioactive isotopes of radium and thorium. As Project Director, he will perform a management and oversight role, managing contracts and overseeing remedial activities performed by a qualified environmental firm with appropriate credentials, selected in compliance with Competitive Procurement Standards in 40 CFR §31.36. Mr. Said has over 27 years' experience in dealing with planning and environmental issues, and has managed numerous grants. †He will oversee the routine interface with the Illinois Environmental Protection Agency, Illinois Emergency Management Agency, the USEPA, DuPage County officials and with personnel in West Chicago's City Hall and municipal government.

West Chicago will utilize the record-keeping and reporting process that has already been established for previous environmental projects. Municipal legal counselors are also engaged for the City, along with municipal accountants that will be responsible for all financial reporting on the grant.

West Chicago is prepared to manage change with a succession plan for this project. The role of Community Development Director would immediately transition to the Assistant Director of Community Development, Mr. John Fincham, should the Community Development Director vacate his position. †If the Assistant Director leaves, the Senior Civil Engineer will take his place until a replacement is found.

V.B.5.b Audit Findings (2 points)

West Chicago has not had any adverse audit findings from any grant, including an Office of Management and Budget (OMB) Circular A-133 audit, an audit conducted by a federal, state, or local government inspector general or similar organization or an audit conducted by the U.S. General Accounting Office (GAO). †The City of West Chicago has not been required to comply with "high risk" terms and conditions under agency regulations implementing OMB Circular A-102.

V.B.5.c Past Performance and Accomplishments (6 Points)

West Chicago has not previously been awarded a Brownfields grant. Refer to Table 5 for details of awarded grants and West Chicago's performance relative to those grants.

V.B.5.c.i Currently or Has Ever Received an EPA Brownfields Grant

West Chicago has not previously been awarded a Brownfields grant.

V.B.5.c.ii Has Not Received an EPA Brownfields Grant but has Received Other Federal or Non-Federal Assistance Agreements

(1) *Purpose and Accomplishments* - West Chicago has a long history of managing federally-granted funds. †The following are some of the funding sources that the City of West Chicago has successfully managed:

Name of Grant/Project	Agency/Organization	Date/Amount of Funding	Purpose of Grant	How Tracked/Progress Measured
Main Street Pedestrian Tunnel Rehabilitation Project	IL Dept of Commerce & Economic Opportunity (DCEO)	2012, \$200,000	Safe pedestrian access across railroad tracks (school kids)	progress tracked by money spent against % complete; improvement in safety realized
Main Street Pedestrian Tunnel Rehabilitation Project	IL Dept of Transportation (IDOT)	2008, \$125,000	Safe pedestrian access across railroad tracks (school kids)	progress tracked by money spent against % complete; improvement in safety realized
Main Street Pedestrian Tunnel Rehabilitation Project	IL DCEO	2012, \$150,000	Safe pedestrian access across railroad tracks	progress tracked by money spent against % complete; improvement in safety realized
Clayton Street Reconstruction Project	IL DCEO	2012, \$200,000	adds much-needed on street parking	project tracked by money spent against % complete; project completed in 2013
Clayton Street Reconstruction Project	DuPage County Community Development Commission (CDC) for Community Development Block Grant (CDBG)	2011, \$300,543	adds much-needed on street parking	project tracked by money spent against % complete; project completed in 2013
Old Heidelberg Collector Street Area Improvement Project	DuPage CDBG	2012, \$191,865	needed street improvement project	project tracked by money spent against % complete
Old Heidelberg Collector Street Area Improvement Project	CDBG	2009, \$200,000	needed street improvement project	project tracked by money spent against % complete
Arbor Avenue Local Area Pavement Preservation (LAPP) Project	IDOT, Metropolitan Planning Organization (MPO), DuPage Mayors and Managers Conference (DMMC), Chicago Metropolitan Agency for Planning (CMAP)	2011, \$303,786	paving project	project tracked by money spent against % complete; finished in 2013
Washington Street Pavement Rehabilitation Project	Surface Transportation Program (STP) grant, with 70% Federal Highway Administration (FHWA) participation	2010, not-to-exceed amount of \$713,000	pavement rehabilitation	project tracked by money spent against % complete; project finished in 2011

The following are some of the environmental investigations that West Chicago has managed or participated in, which ensure success of this cleanup initiative:

- **April 2005:** Comprehensive Superfund settlement with Kerr-McGee Chemical Company was announced by the U.S. Justice Department, in order to result in the clean-up of radioactive wastes and the restoration of natural resources at four Superfund sites in West Chicago, Illinois. Under the settlement, the radioactive contamination from 40 years of disposal at the REF operated by Kerr-McGee and its predecessors, was to be removed.
- **October 2010:** The late Mayor Kwasman, State Representative Randy Ramey, and State Senator John Millner, along with local governmental officials from DuPage County, DuPage County Forest Preserve District, and the Cities of West Chicago and Warrenville, worked to prevent the shutdown of the thorium cleanup project on the West Branch of the DuPage River. In January 2009, Tronox (formerly Kerr-McGee) declared Chapter 11 bankruptcy, and put the completion of the project in jeopardy.
- **October 2014/Ongoing Cleanups:** U.S. Senator Mark Kirk, U.S. Representative Peter Roskam, and Mayor Ruben Pineda, toured the former Kerr-McGee factory site in West Chicago. Local officials appealed to the federal government for help in cleanup of the former factory site, asking for funding from the Department of Energy's Title X program, which reimburses communities that participated in the atomic energy program. The project has not received federal funding since 2009, and the trust overseeing the work doesn't have enough money to finish the cleanup of the factory property.

(2) *Compliance with Grant Requirements* - West Chicago has successfully managed federal funds from the USEPA and HUD, DOT, and Historic Preservation funds that are administered through the State of Illinois under Federal guidelines. West Chicago has a long history of managing federally-granted funds. The City views brownfields as just one component of their overall redevelopment plans.

For the above-listed federal grants used for needed street repairs, repaving and safe crossing for school children so they can walk to school on the other side of the tracks, West Chicago has a strong record. This record includes carefully adhering to work plans, schedules, and terms and conditions for subcontractors. West Chicago made sufficient progress towards achieving success in all of the grants listed above. Many of the projects are now complete. Some weather-related issues along with some project delays have occurred, associated with the construction of a tunnel near active railroad tracks.

V.B.5.c.iii Has Never Received Any Type of Federal or Non-Federal Assistance Agreements (3 points)