

STEPHENSON COUNTY COMMUNITY-WIDE HAZARDOUS SUBSTANCES ASSESSMENT  
STEPHENSON COUNTY, ILLINOIS

**THRESHOLD CRITERIA**

1. Applicant Eligibility:

Stephenson County is an incorporated municipality of the State of Illinois and has the authority to enter into a cooperative agreement with the United States Environmental Protection Agency.

2. Letter from the State or Tribal Environmental Authority:

Stephenson County has received a letter of acknowledgement from the Illinois Environmental Protection Agency.

3. Site Eligibility and Property Ownership Eligibility:

Not Applicable. An eligibility determination matrix will be submitted for each of the sites selected for assessment upon the award of this Community-Wide Hazardous Substances Assessment Grant.

**RANKING CRITERIA**

**A. Assessment Grant Proposal Budget (Community-Wide Hazardous Substances: \$200,000)**

Stephenson County intends to use this grant to further the progress that they have made with their previous assessment grant funding as well as to expand their assessment activities to other vital properties within the County. The County will continue to prioritize potential sites that have been identified by a review of historical directories, Sanborn Fire Insurance maps, and historic images of the County. Once the sites are prioritized, eligibility determination information will be prepared and submitted to the United States Environmental Protection Agency and the Illinois Environmental Protection Agency when applicable. Phase I and Phase II Environmental Site Assessments will be conducted and remedial planning will commence for sites that have been identified as contaminated. The following table provides information on the anticipated costs to conduct the various tasks needed to transition the stagnant County to vibrant redevelopment. We will also allocate funds in the budget to allow for County officials to attend the National Brownfields Conference.

PROJECT TASKS								
BUDGET CATEGORIES	Site Prioritization & Eligibility Determinations	Health and Safety Plan/ Quality Assurance Project Plan	Phase I Environmental Site Assessments	Phase II Environmental Site Assessments/ Remedial Planning	IEPA Expense	Community Involvement	Program Development	Total
Personnel								
Travel							\$3,000	\$3,000
Equipment								
Supplies								
Contractual	\$7,500	\$2,500	\$17,000	\$129,500	\$30,000	\$5,500	\$5,000	\$197,000
Other								
USEPA Grant Total	\$7,500	\$2,500	\$17,000	\$129,500	\$30,000	\$5,500	\$5,000	\$200,000
In-Kind								
Project Total	\$7,500	\$2,500	\$17,000	\$129,500	\$30,000	\$5,500	\$8,000	\$200,000

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### *Task 1: Site Prioritization & Eligibility Determinations*

Eighty-three (83) sites were identified as possible brownfields sites using 2005 grant funds. Public meetings were held to solicit citizen and leader input from throughout the County. Input was gathered from these meetings about numerous sites throughout the County. A Brownfields Redevelopment Advisory Committee (BRAC) was then formed to provide input and guidance to our brownfields consultant who facilitated the prioritization process. The BRAC worked with our brownfields consultant to develop site prioritization criteria that met the needs of our communities and citizens. Two general categories were developed: redevelopment criteria and environmental criteria. After several BRAC meetings, the redevelopment criteria selected was abandonment, viability of area where the site is located with respect to redevelopment, proximity to existing infrastructure, location relative to floodplains or floodways, and whether the site was in a TIF or Enterprise Zone. We charged our environmental consultant with providing a cursory review on the environmental condition of the sites. The criteria were ranked. A redevelopment score and an environmental score were then calculated. A composite score was also developed. These scores were then used by the BRAC to make final decisions for prioritization. Eligibility determination information was then gathered and submitted to U.S. EPA Project Manager Keary Cragan. The same process will be used for any additional sites that will be identified. Additionally, lower ranking sites from the original site prioritization may become higher priority in the future, and if so, eligibility determinations will be conducted.

### *Task 2: Health and Safety Plan and Quality Assurance Project Plan*

An overall Health and Safety Plan (HASP) will be prepared for Phase II Environmental Site Assessment activities. Site specific plans will be developed that refer to the general Health and Safety Plan. A Quality Assurance Project Plan (QAPP) will also be prepared by the contracted brownfields consultant in accordance with the Environmental Protection Agency's guidelines.

### *Task 3: Phase I Environmental Site Assessments*

This task involves a study of the historic significance of the properties that have been identified and prioritized. The Phase I Environmental Site Assessment involves research of the historical uses and activities of the site as well as:

- Inspecting the property
- Identifying past owners and property use
- Review of governmental records to determine past use and/or disposal of hazardous substances
- Interviewing past property owners or employees
- Reviewing aerial photographs of the site
- Reviewing state and federal databases that list contaminated sites
- Review adjacent properties to evaluate potential sources of off-site contamination

All Phase I Environmental Site Assessments will be conducted in general accordance with ASTM 1527-05 Standard which addresses the standard to the All Appropriate Inquiry (AAI) requirement of the 2002 Small Business Liability Relief and Revitalization Act. AAI regulations will be used for all Phase I Environmental Site Assessments. The Phase I Environmental Site Assessment will indicate whether hazardous substances are identified as Recognized Environmental Conditions (REC's) to a particular property and whether a Phase II Environmental Site Assessment should be initiated. Because our need is greater for Phase II Environmental Site Assessments and remedial planning based on work conducted with our previously awarded grant funds, we anticipate conducting only three (3) to five (5) Phase I Environmental Site Assessments under this grant, if awarded. The typical cost on small sites for a Phase I Environmental Site Assessment is approximately \$2,500, with larger, more complex sites ranging in costs from \$3,000 to \$10,000.

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### *Task 4: Phase II Environmental Site Assessments/Remedial Planning*

We anticipate conducting approximately three (3) to five (5) Phase II Environmental Site Assessments at Phase I Environmental Site Assessment sites where Recognized Environmental Conditions (RECs) have been identified. Costs on a per site basis will vary widely based on site specific conditions, but we anticipate the costs will range from \$25,000 to \$75,000. Collected samples would be the Target Compound List (TCL) parameters needed for possible enrollment into the IEPA SRP as a “Comprehensive” site investigation compared to a “Focused” investigation. The purpose of a Phase II Environmental Site Assessment is to investigate the RECs identified in the Phase I Environmental Site Assessments to determine if contamination is indeed present. The assessments will determine what contaminants are in fact present and what levels of contamination are apparent on the sites. The results of the Phase II Environmental Site Assessment work will be compared to the Illinois Environmental Protection Agency’s Tiered Approach to Corrective Action Objectives (TACO) to evaluate contaminants and provide a baseline for comparison. If contamination is identified, then we will enroll the impacted sites in the Illinois EPA’s voluntary Site Remediation Program (SRP) for further investigation and remedial planning as Comprehensive sites where the TCL analytical testing is required. We anticipate the enrollment of two (2) to three (3) sites into the SRP. Additionally, one (1) site is currently enrolled into the SRP where a Site Investigation Report (SIR) will be completed with current funding. The preparation of a Remedial Objectives Report (ROR) and Remedial Action Plan (RAP) will also be funded with this grant.

### *Task 5: IEPA Expense*

The County will enroll sites where contamination is discovered as part of the Phase II Environmental Site Assessment activities into the Illinois Environmental Protection Agency’s Site Remediation Program. This program requires the remedial applicant to pay for Illinois Environmental Protection Agency project management fees. There is also an initial application fee of \$500 per site enrolled. While IEPA fees vary, we anticipate that \$10,000 in IEPA on average could be incurred for the enrolled SRP sites.

### *Task 6: Community Involvement*

As stated previously, public meetings were held to gather input from citizens and community leaders. We will continue to encourage and facilitate community involvement in the development of the strategic plan for reuse of the identified properties. Community participants will include community residents, government officials and private-sector representatives. Because Brownfields Projects are partnerships between the private and public sectors, industrial, financial and community representatives will benefit from the collaborative planning regarding potential investment and development opportunities. In certain cases, public meetings related to specific sites have been held to seek input from residents in the proximity of the sites. We anticipate these types of efforts to continue and are in need of additional grant funding to facilitate follow-up meetings. The County will also continue to distribute quarterly reports or newsletters on the progress of the brownfields projects and describe any milestones.

### *Task 7: Program Development*

Coordination with the United States Environmental Protection Agency, preparation of requisite agency reports, facilitating the Brownfields Redevelopment Advisory Committee (BRAC) meetings, project management team meetings, and the travel expense for attendance of our County Board Chairman John Blum and/or County staff at brownfields conferences are all included in the program development budget category.

## **B. Community Need**

1. Stephenson County is a rural northwest Illinois county covering approximately 568 square miles, located approximately 106 miles northwest of Chicago. According to the 2000 Census, approximately 48,989

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people reside in Stephenson County. The County Seat is located in the City of Freeport, which is also the largest community in the County with a population of 26,443. There are numerous unincorporated areas throughout the County – most located along either a waterway or a former railroad line. Ten other communities make up the incorporated areas of the County.

Stephenson County is deeply and proactively committed to addressing brownfield sites that pose risks to both the environment and our residents' health. The County is also fully committed to addressing those sites that hinder vital redevelopment and economic revitalization in our communities. Unfortunately, our County contains numerous brownfields sites due to our historically industrial-based economy. Due to its advantageous location near major highways, several prominent rail lines, proximity to the cities of Rockford and Chicago, the Pecatonica River, and availability of desirable land, Stephenson County's economic growth was facilitated by industrial and manufacturing activity. This was true especially of the City of Freeport, where many major manufacturers chose to locate. Throughout the late 1800's and the early 1900's, Freeport was surfacing as a manufacturing powerhouse. Various companies set up shop throughout both the downtown and the outskirts of the City. Some of these companies included: H.D. Bentley Company, Dirksen Filigree, Journal Block, W.T. Rawleigh Company, Furst McNess Company, Stover Manufacturing Company, S.N. Swan & Sons, and the Union Dairy Company. As time progressed, companies began to identify Stephenson County as an ideal area for their relocation. Prominent manufacturers such as Honeywell, Newell/Rubbermaid, and the Titan Tire Company chose Stephenson County as the location for their company's Headquarters or major divisions. While Freeport was prospering with manufacturing, the other communities within the County were thriving as well. These municipalities were self-sufficient communities that played host to several small, successful factories that manufactured such items as toys, cheese, bricks, wool, and furniture.

Aside from manufacturing interests, the County's other economic focus was agriculture-related. Approximately 31% of Stephenson County's population resides in the rural and agricultural areas of the County. From the early days of initial settlement; mills, coal yards, stockyards, and grain elevators contributed to commerce throughout the County. However, as a primarily rural County, we have watched our businesses struggle to meet global changes and to adjust with the ever-evolving economies of scale. In an attempt to stay afloat, these large and small manufacturers and agri-businesses moved to larger communities outside of the County. The long-time, high-employee Fortune 500 Companies that once relocated their major divisions and headquarters within the County decided to either drastically downsize, close, or move out completely, placing hundreds of high wage-earning employees out of work. Unemployment in Stephenson County hit a 13-year high in 2003, ranging from 7-9% per month, which is considerably higher than state and national averages.

Currently, the incorporated villages and towns located within Stephenson County are characterized as bedroom communities as most of the villages do not have significant commercial interests that support measurable numbers of employees. The abandoned factories, agri-businesses, and commercial enterprises throughout the county have been virtually ignored for redevelopment. There is a hesitancy to develop on these abandoned sites because of fears of environmental contamination. The unincorporated and rural areas of the county, due to the lack of jobs in close proximity, house a disproportionate number of low-to-moderate income households. The added blight contributed by the abandoned facilities leads more affluent county residents to more attractive locales. In this way, the cycle is perpetuated. The townships, villages, and residents where these abandoned properties are situated, bear the brunt of the lack of attention. Public infrastructure lies dormant and the sites pose environmental threats to the health and safety of the community in lieu of development in environmentally pristine areas. There is a growing unease among the county residents whose homes, schools or businesses are adjacent to these potentially contaminated sites. Concerns

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over groundwater contamination, in particular, have been the impetus for informal gatherings of concerned citizens over the past several years.

County unemployment and underemployment was most recently documented in a Northwest Illinois Workforce Investment Board labor shed study that found that the Stephenson County area has a pool of approximately 12,000 unemployed people and an additional pool of about 19,600 workers that are currently underemployed. Manufacturing, which once had a strong-hold on the economy of northwest Illinois for several decades, has since drastically declined. Please see the table below that fully illustrates the impact of the decline of manufacturing in the regional area:

<b>EMPLOYMENT IN MANUFACTURING INDUSTRY BY COUNTY</b>			
<b>COUNTY</b>	<b>1990</b>	<b>2000</b>	<b>2005</b>
Stephenson	27.5%	23.1%	20.3%
Ogle	30.4%	22.6%	20.6%
Whiteside	27.1%	23.8%	19.8%
Jo Daviess	17.6%	15.2%	13.5%
Carroll	9.0%	14.4%	12.3%

(SOURCE: Northern Illinois Market Facts 2006)

As illustrated in the table above, you can see that manufacturing, a once thriving industry in Northwest Illinois, has taken a sharp drop over the past 15 years – a drop of 7.2% for Stephenson County. This decline continues today with several large employers cutting jobs, moving their operations, or closing down altogether. These companies include Honeywell, Newell/Rubbermaid, and the Titan Tire Company. The manufacturing sector is responsible for over 26% of all wealth created in the region, compared to 17% for the State of Illinois as a whole. This dependence on manufacturing, which was once strength of the region, is now a significant weakness of the economic vitality of the County.

Being a small, rural County, Stephenson County’s municipal resources are much more limited for reinvesting in brownfields redevelopment than other larger counties and communities. Our financial resources are already spread extremely thin. Unemployment continues to run higher than the state and federal rates and median household income is consistently lower than the state and national median dollars. As the commercial center of the County, Freeport’s economic numbers also display these declining trends. Additionally, in August 2007, Stephenson County and the City of Freeport were designated Presidentially-declared Disaster Areas due to flash flooding, further stretching our fiscal and personnel resources. After examining our demographics, it is apparent that the County is in need of this funding.

<b>DEMOGRAPHIC PROFILE</b>	<b>CITY OF FREEPORT</b>	<b>STEPHENSON COUNTY</b>	<b>STATE OF ILLINOIS</b>	<b>UNITED STATES</b>
<b>Population</b>	26,443	48,979	12,419,293	281,421,906
<b>Minority %</b>	18.2%	10.7%	26.5%	24.9%
<b>% Families Below Poverty Level</b>	9.9%	6.5%	7.8%	9.2%
<b>Unemployment Rate</b>	5.0%	4.1%	3.9%	3.7%
<b>Median Household Income</b>	\$35,399	\$40,366	\$46,590	\$41,994
<b>Per Capita Income</b>	\$18,680	\$19,794	\$23,104	\$21,587
<b>% Vacant Housing Units</b>	10.0%	8.9%	6.0%	9.0%

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<b>% Female Households</b>	12.6%	9.5%	12.3%	12.2%
<b>Median Home Value</b>	\$71,600	\$81,400	\$130,800	\$119,600

(SOURCE: US CENSUS, 2000)

2. Community-wide Hazardous Substances Assessment grant funding will benefit County residents by reducing potential risks to human health and the environment and returning properties to a productive use, helping Stephenson County to turn the corner on economic revitalization. Through our Brownfields Program, the County is working toward bridging the economic gaps between the significantly disadvantaged populations and lesser impacted communities in the County. Assessing brownfields throughout Stephenson County will result in considerable benefits to our communities’ economic, social, and environmental well-being. The expected benefits of assessing brownfields in Stephenson County include:

- Reducing risks to human health and the environment by identifying contamination that is potentially impacting our soil, groundwater, water resources like the Pecatonica River, and our municipal wells;
- Stimulating economic growth throughout the County by removing development apprehensions due to perceived contamination and creating opportunities for new businesses and job creation;
- Promoting reinvestment in the areas of the county that are characterized by lower home values and higher concentrations of low-income and minority residents than the County as a whole;
- Encouraging the expansion and maintenance of recreational development and the ecological restoration of the Pecatonica River
- Promotion of expanded recreational development such as the creation of recreational trails/paths and the use of the Pecatonica River as a County-designated Water Trail

In 2005, Stephenson County was awarded U.S. EPA brownfields assessment funds. With these funds, we have successfully identified approximately eighty-three (83) sites throughout the County that potentially contain contamination based upon their historic uses. Also through the use of previous U.S. EPA assessment funds, we performed several Phase I and Phase II Environmental Site Assessments on sites that have been determined as contaminated. Stephenson County is seeking additional funds to continue these assessment activities at these identified sites so we can return to them productive and effective use. Since we are a small, rural municipality, our funds are extremely limited for brownfields redevelopment and since we are facing an extremely critical juncture at this point in our program, U.S. EPA funding is essential to continue any redevelopment progress that we’ve made thus far through the program.

3. We have successfully identified approximately eighty-three (83) sites throughout the County that may potentially contain hazardous substance contamination based upon their historic uses. We have identified these sites with federal funding from a previous U.S. EPA Brownfields Assessment Grant, the Illinois Environmental Protection Agency, the Stephenson County Health Department, the Illinois Department of Public Health, and historic information from Sanborn Fire Insurance maps and Polk Directories. The impacts of these sites upon our County affect our economy and most importantly, the health of our residents and our environment. We can attest to and foresee the following impacts of these sites on the County:

*Economic Impacts:* Brownfields have proven to be a definite obstacle to overcome in initiating the revitalization of the County’s economy. Reinvestment throughout the County is hindered due to concerns of perceived environmental contamination of sites based upon their historical uses. Developers are hesitant to redevelop abandoned factories, agri-businesses, and commercial enterprises throughout the County. Stephenson County once had a thriving economy with the City of Freeport and the Village of Lena as the commercial and industrial centers for the County. The County is now characterized by devalued property,

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economic stagnation, poverty, and blight. The value of homes throughout the County is much less than the median home value of both the State and the nation as a whole. The median home value in the County ranges from 28.0 – 32.0% lower values than that of the median home value in both the State of Illinois and the United States (US Census Bureau, 2000).

*Health Impacts:* The residents of Stephenson County are very familiar with the impacts upon their health that can result from exposure to hazardous substances brownfields contamination. In 1999, the United States Environmental Protection Agency was called on to respond to an emergency response for a freestanding mercury incident involving two boys in one of the abandoned manufacturing facilities in the County. In addition, citizens of the City of Freeport formed the East Side Environmental and Health Task Force due to their concern over the health disparities of residents that may be linked to environmental contamination. Jeff Todd, the Administrator of the Stephenson County Health Department at the time, was a key member of this Task Force and was able to provide assistance from the Illinois Department of Public Health toxicologists and epidemiologists.

*Environmental Impacts:* In addition to economic and health impacts, brownfields, of course, make an environmental impact upon the areas in which they are located. The Pecatonica River is in close proximity to many of the abandoned and potentially contaminated manufacturing facilities in the County. This close proximity provides for a fragile hydrogeological setting of a shallow aquifer within sands and gravels. Combined with the previously identified historical property uses, the threat of migrating contaminants throughout the County is highly elevated. The shallow groundwater that flows toward the river, when not influenced by well pumping, makes the river very susceptible to contaminant impact. Contamination flowing to the river from the groundwater could impact the ecological condition of the river. As part of the Illinois Environmental Protection Agency's Site Remediation Program (SRP), surface water bodies are identified and evaluated to determine their impact from soil and groundwater contamination.

### **C. Site Selection Process**

1. If this grant is awarded, we will immediately reinitiate work with the existing Stephenson County Brownfields Redevelopment Advisory Committee (BRAC) that will provide us with input and guidance from key stakeholders in our community. We will conduct a series of community involvement meetings to seek input from our community members. We will gather information related to the brownfield sites and find out what is important to the members of our community, as we have done with our previous assessment funds. Examples may be blight removal, increased greenspace/recreation space in certain locations, contaminant removal, and job creation to name a few possibilities. This list of values identified by our citizens will be taken to our BRAC. Just as we did with our previous assessment funds, the BRAC will then work with a qualified Brownfields consultant to develop a set of criteria that are specific to our community. There will be two categories of criteria. The first category will be related to redevelopment potential and the second category will be in regards to blight removal and environmental contamination of the properties. The first would be for criteria that are related to the redevelopment potential of a site. Additional criteria may be added by the BRAC based on specific expertise and insight that the group will provide. We will commission a qualified brownfields consultant to provide insight on the second category of criteria, which is related to the identification of environmental contamination and its impacts upon the selected sites. The BRAC will then develop a numeric rank system for each criterion. A redevelopment score can then be developed along with an environmental score. The scores can then be summed to provide an overall score. The scoring will not be used as an absolute by the BRAC to rank the sites, but merely as a guide.

Sites that are selected for assessment activities by the BRAC will then need to be approved by the Illinois Environmental Protection Agency and our project's United States Environmental Protection Agency

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assigned Project Manager. Stephenson County will submit Eligibility Determination Forms to the United States Environmental Protection Agency and will await approval prior to commencing any assessment work funded by this grant. We are also aware of the recently promulgated All Appropriate Inquiry legislation and fully intend to comply with these standards on each of our site selections, if applicable.

2. We have currently inventoried approximately eighty-three (83) potentially contaminated sites based on information from our previous assessment grants, a review of historical Polk directories, and Sanborn Fire Insurance maps that identified potential sites located within Stephenson County. The past property uses that were identified include the following:

- Historical railroad operations
- Numerous abandoned and underutilized manufacturing operations
- Former asphalt batch plant and quarries
- Historical dry-cleaning facilities

3. We do not foresee any access issues but should a property be privately owned, a written access agreement will be obtained from the owner by the County. No property owner will be coerced into participation in the County's brownfields assessment activities. We will openly communicate to these property owners the intent of this program, which is to take abandoned and underutilized properties that have identified or perceived contamination and work to clean them up. This funding will be used as a catalyst for redevelopment. We are fully aware of the issues that can arise with site access and we will rely on our BRAC and selected Brownfields consultant to assist with this issue.

### **D. Sustainable Reuse of Brownfields**

1. Pollution prevention and the reduction of resource consumption are important goals of our Brownfields Program. Assessment of the abandoned or underused properties that are selected for assessment as part of our Brownfields Program will funnel investment at sites served by existing infrastructure, thereby maximizing our use of land resources. Stephenson County also recognizes the importance of "green building" and is committed to implementing "green" solutions to these redeveloped properties.

To prevent future brownfields we will use the approaches of code enforcement, property owner education, and business retention. Our municipal code includes provisions governing the proper disposal of all types of waste, including hazardous materials. We also work closely with IEPA's Rockford office to address potential violations. To prevent current industrial sites from being vacated, thus creating new brownfields, we proactively retain existing viable industrial businesses by partnering with the Freeport Area Economic Development Foundation. The Foundation helps connect these businesses with a network of business development and retention services in our region to help keep quality jobs in the County. One economic arena that Stephenson County is very passionate about pursuing is renewable energy. The County, with the assistance of the Freeport Area Economic Development Foundation, is in the process of bringing renewable energy companies to the County, including Wind Farms, Ethanol Plants, and a Biodiesel Facility. Since Stephenson County is very rural and agri-business is an important component of the County's economy, renewable energy businesses will fit well into the County's sustainable, economic plan.

2. The primary economic benefits of assessing sites through this program will be the resulting job creation and expansion of the County's tax base both from the future redeveloped brownfield sites themselves and positively affected surrounding areas. The County anticipates that this program will encourage and inspire existing companies to consider expansion and return hope to the economy of the County. By encouraging the reuse of these contaminated properties, the County will retain existing business and benefit from their

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growth. These redeveloped properties will stimulate economic growth in the County, which has been stagnant and neglected for years.

3. Brownfields assessments will promote vibrant, equitable, and healthy communities through revitalizing contaminated and blighted sights and identifying threats to the health and safety of both the public and the environment. Specifically, the program will:

- Improve County-wide and regional greenspace amenities through remediation of sites identified for recreational use in the Freeport and Stephenson County Greenways and Trails Plan, including sites along the Pecatonica River
- Promote improved quality of life in neighborhoods most impacted by brownfields by positioning the sites and surrounding areas for reinvestment
- Advance the Smart Growth goals and objectives identified in the County Comprehensive Plan by focusing on redevelopment to areas within designated urban growth areas and simultaneously discouraging wasteful development of our surrounding rich agricultural resources
- Promote redevelopment in an area targeted for a potential Amtrak rail station – strengthening our County’s use of non-vehicular transportation

### **E. Creation and/or Preservation of Greenspace/Open Space or Nonprofit Purpose**

If awarded, these grant funds will facilitate the development of greenspace or open space at sites that have been identified as potentially contaminated or indeed contaminated and where the best reuse option would be the development of such. While plans have yet to be developed, there is an intention to include or develop greenspace throughout the County through one of the following options: development of recreational trails that wind throughout the County and along the Pecatonica River, connecting to both the Jane Addams Trail and the Grand Illinois Trail; promotion of the Pecatonica River as a County-designated Water Trail; and the potential reuse of Tutty Baker Park –a site that was historically a filling station and turned into basketball courts that was determined to be contaminated due to previous U.S. EPA assessment funds – as a neighborhood park or garden. We will work directly with the community Park Districts to develop any greenspace/openspace that will be created with these grant funds. The County and the local Park District will create an agreement that states that the space will be maintained by the local Park District.

### **F. Pre-Award Community Notification**

1. Once the decision was made to pursue this assessment grant, we have made every effort to notify the County as a whole of our intentions. We have made formal notifications to the public through various methods which are summarized in the list below:

- Formal Public Notification of Pursuit of Grant Funding: The County made their pursuit of additional brownfields funding public in April of 2007 during the State of the County Address made by County Board Chairman John Blum. The State of the County Address was posted on the County’s website and published in the Freeport Journal Standard.
- Discussion of the Grant Proposal at County Departmental Meetings: We were sure to discuss the brownfields grant proposal with the Planning & Development Committee to address their concerns and ideas as well as to gain insight into potential brownfields sites and end uses. The Planning & Development Committee held their meeting on August 27, 2006.
- Discussion of the Grant Proposal at County Board Meetings: Following County Committee meetings, full County Board holds their meeting the second Wednesday of every month at 6:30pm. The County’s Committee meetings are reported on at County Board meetings and discussed. The dates that the proposal was discussed were September 12 and October 10, 2007.
- Notification of Grant Availability for Public Comment: A press release was issued on Monday, October 1, 2007 notifying Stephenson County residents of the availability of this application for public review

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and comment. The press release notified the public in the following ways: website posting, an article in the newspaper, and announcements on the radio. The media outlets that were utilized were: the Stephenson County website, Journal Standard newspaper, and WFPS 92.1 radio station. The draft proposals were available at the County Clerk's office, the Freeport Public Library, and posted on the Stephenson County website.

If these grants funds are awarded, we will hold a two-week public comment period on our draft work plan and announce the availability of the plan through a press release to local media. As we move forward with the assessment program, we will develop fact sheets on the status of brownfields assessment activities at important junctures, but semiannually at a minimum. We will post these fact sheets on our webpage, distribute them at the courthouse and the library, and mail them directly to our project partners and directly affected residents. Lastly, we will continue to hold monthly BRAC meetings to ensure community oversight of our brownfields initiative.

2. Since our proposal is community-wide, the focus of our notification program was community-wide. The appropriate notification methods that we used were newspaper articles, radio announcements, web publishing/posting, County Board meetings, and County Committee meetings. We did not translate our proposal or press releases into other languages as our largest linguistically isolated group, Spanish-speaking households, only makes up less than 1% of our population (U.S. Census 2000). If we are awarded this grant, we will continue to use diverse notification methods to ensure that we reach a broad audience. It will also be a priority for us to ensure that we are describing our activities and progress in ways that are easily understood by our residents who will most likely be unfamiliar with environmental and scientific terminology.

3. Our grant proposals were available for public review and comment for two weeks, from September 28, 2007 to October 11, 2007. We made our proposals available to the public by posting them on the County's website and making hardcopies available at the County Clerk and Recorder's Office and the Freeport Public Library. We encouraged public comment in various ways: (1) requesting public comments in our press releases issued September 28, 2007; (2) requesting comments from our brownfields partners by directly contacting each partner and providing them with a hardcopy of our proposal to review; (3) providing various comment mechanisms for the public: mail, email, fax, phone, and in person; and (4) identifying in the press release the contact information of staff at Stephenson County who would be available to accept comments during the comment period. The Freeport Journal Standard also published a Public Notice in their October 1, 2007 issue encouraging public comment on the grant proposals. We also had a constant notice posted on our website reminding and encouraging our residents to provide us with comments on the proposals.

4. We plan to integrate the comments received by the public into the proposal prior to submission. If possible, we will ensure that the individual who provided the comment will receive a final copy of the proposal that includes their comment or suggestion. If this grant is awarded, we will also circulate the draft grant work plan to the Brownfields Redevelopment Advisory Committee and incorporate their comments into the final work plan. We will also announce the availability of the draft work plan for a 2-week public comment period through a press release to local media. We will summarize any major comments received and describe how we responded to these comments in the work plan.

### **G. Ongoing Community Involvement**

1. Stephenson County is submitting a community-wide application so any community outreach/involvement activities will target the entire County. When properties are selected for assessment, the County will work with local neighborhood organizations and citizens groups to communicate the assessment and remedial action plans for the property to affected residents and businesses. The County will allow for local residents,

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neighborhood organizations, and citizen's groups to have the opportunity to express their concerns, identify their needs, and provide input on redevelopment plans. Immediately following award announcement, we will hold a public meeting to overview the goals of the Assessment Grant and its process. A public comment period will follow the public meeting allowing for the residents, especially those located near contaminated properties, and other stakeholders to express their comments and concerns. Representatives for the residents and businesses from the target area will be extended an invitation to join the existing Brownfields Redevelopment Advisory Committee (BRAC), since their input will be extremely valuable to cleanup decisions and reuse planning ideas.

We made our pursuit of Brownfields funding public in April of 2007 when the County Board Chairman announced it in his "State of the County Address." The public was updated on the success of the County's current Brownfields Program and notified that further funding would be pursued to maintain and expand upon the successful program. Our Brownfields proposal has also been discussed at various meetings over the past few months. The proposal was discussed at the Planning & Development Committee meeting August 30, 2006. The County Board discussed the proposal at their September 11, and October 10, 2007 full County Board meetings. On October 1, 2007 we issued a press release stating that our Brownfields proposals were available for review and public comment. The public comment period lasted two weeks, from September 28 to October 11, 2007.

Stephenson County has facilitated various community involvement activities over the course of our Brownfields Program. One activity in particular was the Community Meeting that was held at the Tutty Baker Park and Former Mortuary Sites in the City of Freeport in July of 2007. The County hosted a Community Meeting on the actual, physical sites where they provided food and beverages to all that attended and sought direct input from the residents about what they would like to see developed and what the community had a need for. This was a very successful community outreach effort for the County.

2. Stephenson County has worked with various organizations in their efforts thus far to ensure that once these sites are assessed, we have created appropriate and sustainable redevelopment plans. The County has an exceptional relationship with the Illinois Environmental Protection Agency, the Stephenson County Health Department, and the Stephenson County Soil and Water Conservation District. IEPA has been extremely involved groundwater contamination identification and reduction efforts. They will be critical partners in our brownfield cleanup and redevelopment efforts as they will oversee the cleanup of our sites through their Site Remediation Program (SRP). The Stephenson County Health Department will continue to work with us to identify potential health threats to the residents. They will be an asset to us in our efforts to effectively relay information to the County. The Stephenson County Soil and Water Conservation District will provide a vital partnership in dealing specifically with our groundwater and soil contamination issues. They will ensure that we develop plans to involve the community in reducing groundwater and soil contamination and focus on educating our community on these issues.

3. As our brownfields assessment continues, we will be sure to remain in regular, transparent communication with our residents. Communication will take place in various methods: web, print, radio, direct mailings, and meetings. While we do not intend to translate all project information, we will be sure to offer the translation of project information and documents to those individuals and households that request us to do so. Our community involvement program will be composed of the following:

- Quarterly newsletters or Fact Sheets will be prepared to relay the progress of our brownfields projects as they continue along. These documents will be posted on the web, distributed at County Board meetings, and mailed directly to stakeholders, community organizations, and BRAC Committee Members.

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- Public meetings will be held at milestone points in our project to further develop the appropriate orientation and development of our brownfields projects.

4. Key community-based organizations that will be beneficial to the County's Brownfields Program include: **Freeport Area Economic Development Foundation (FAEDF): Robert Skurla, Executive Director (815)235-4038** FAEDF concentrates on retention and creation of jobs in the primary sector, in addition to the service and retail markets. They work collaboratively with the Chambers of Commerce, the City of Freeport, Stephenson County and other local and area governmental units and other groups to improve business expansion and the well-being of the community.

**Neighborhood Housing Services of Freeport (NHS): Deb Elzinga, Executive Director (815)232-6197** The mission of NHS of Freeport is to advance home ownership, home improvement and community-building activities designed to strengthen neighborhoods and improve the lives of people. Neighborhood Housing Services of Freeport is a community-based nonprofit organization, committed to improving our neighborhoods and the lives of people in our community.

**Freeport Downtown Development Foundation: Quentin Davis, Executive Director (815)232-9000** The Freeport Downtown Development Foundation works to revitalize the once thriving downtown of the City of Freeport. The Freeport Downtown Development Foundation supports the County's efforts to cleanup and redevelop contaminated properties to create and maintain business in the downtown.

**Stephenson County Soil & Water Conservation District (Earth Team): Randy Grunder, District Chairman (815)235-2161** The District's main goal continues to be the protection and enhancement of our county's soil and water resources. Volunteers have been the cornerstone of the soil and water conservation movement. The District's volunteers become part of the *Earth Team Volunteer Program* who work to help people conserve, improve, and sustain our resources and environment.

**Freeport Area Chamber of Commerce: Kim Grimes, Executive Director (815)233-1350** The Chamber provides leadership and value-added services to businesses through communication, networking, advocacy and education to ensure business retention, continuous improvement and an environment of economic growth and prosperity for the community.

**Freeport Park District: Jack Carey, Executive Director (815)235-6114** Known for its foresight in preserving open space and land for public parks and recreation, the District was organized with a mission to promote the use of recreation and generate an exciting, dynamic quality of life for its community by providing the highest quality facilities and programs to meet the ever-changing needs and interests of individuals of all ages and abilities. The Freeport Park District will assist the County in the development and maintenance of green and open space for parks and other recreational purposes.

**Illinois Environmental Protection Agency: Steve Colantino, Manager, Office of Brownfields Assistance (217)782-3397** If this grant is awarded, the Illinois Environmental Protection Agency's Office of Brownfields Assistance has agreed to administer the Revolving Loan Fund for Stephenson County.

**Stephenson County Health Department: Craig Beintema, Administrator (815)235-8271** The Stephenson County Health Department is guided by a profound sense of personal and professional duty and responsibility; an abiding respect and compassion for others; a commitment to the principles of equity and social justice; an appreciation for diversity; a passion for excellence; and a spirit of cooperation. The County will work directly with the Health Department in the elimination of environmental contamination.

### **H. Reduction of Threats to Human Health and the Environment**

1. One of our primary objectives in obtaining US EPA grant funding is to identify and reduce threats to human health and the environment posed by brownfield sites. Local, shallow groundwater is the sole source of drinking water for our communities so the protection of our water resources is extremely important to us. With this funding, we intend to directly address brownfield sites in our communities that pose any threat to the quality of the drinking water. We have already taken an important and proactive approach to identifying

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threats by identifying potential brownfield sites with assistance from the County's previous Assessment Grant, Stephenson County's established BRAC (Brownfields Redevelopment Advisory Committee), and from historical information extracted from Sanborn Fire Insurance maps and Polk Directories by an environmental consulting firm.

Abandoned industrial facilities are among the worst environmental issues facing the County. In the mid-1990's, two local boys entered the abandoned Rawleigh Complex, the former facility of the W.T. Rawleigh Corporation, located in Freeport, Illinois. The boys went on to gather mercury from thermostats and thermometers left in the abandoned facility. The boys contaminated themselves and their homes with dangerous levels of mercury. This incident triggered a US EPA emergency response. EPA came to the City of Freeport to decontaminate the two houses and to remove the remaining mercury from the abandoned industrial complex. To prevent this type of event from ever happening again, the County has taken a proactive approach to brownfields assessment and cleanup.

The hydrogeologic setting of Stephenson County is characterized by shallow bedrock. The uppermost bedrock is dolomite and shale of the Galena-Platteville group. Below is the St. Peter Sandstone that is a major source of potable drinking water in the County. Releases of dense non-aqueous phase liquids (DNAPL) is of particular concern in our County. The dense non-aqueous phase liquids can sink and migrate in the fractured bedrock that historically was perceived to be protective of contamination, but has been proven not to be. Contamination in the bedrock from DNAPL is a very real issue in our County. Alluvial deposits along the Pecatonica River are also highly susceptible to contaminant impact. A City of Freeport municipal well has had detections of chlorinated solvents above drinking water standards that required the installation of an airstripper to treat the water from the well. At present, this well has been shut down. Several sites that are not abandoned Brownfields sites have already been enrolled in the Illinois EPA Site Remediation Program for DNAPL contamination. The number of other sites that could be contaminated with DNAPL in a shallow bedrock setting is not fully known. While great strides have been made with our current grant funds, we cannot continue this vital work without these additional assessment funds.

The associated health and environmental risks will be characterized during our evaluation process, with sites that pose the most impact being given more priority to be fully characterized and remediated. With potential sites already identified, the funds provided with the award of this grant will reduce threats to human health and the environment. The funds will be used for Site Prioritization & Eligibility Determinations, creation of a Health and Safety Plan and Quality Assurance Project Plan, conduction of Phase I and Phase II Environmental Assessments, Enrollment of Sites into Illinois EPA's Site Remediation Program, and Community Involvement and Program Development activities. The sites that will be determined as contaminated will be enrolled into the Illinois Environmental Protection Agency's Site Remediation Program (SRP), which is the Illinois Environmental Protection Agency's voluntary cleanup program. Remediation and cleanup efforts will continue at the site until the Illinois Environmental Protection Agency issues a "No Further Remediation" letter for the site. Our efforts will focus on both existing underutilized sites and sites that formerly operated as businesses and may have released contaminants to subsurface. Our brownfields assessment efforts will compliment the County's existing Brownfields Program and progress that has been made thus far.

The proposed end use of these brownfield sites will be targeted primarily for commercial and greenspace development. This end use will inevitably lead to cleanup activities as part of the redevelopment process. Once these properties have been cleared of perceived contamination or have gone through remediation, developers will not be apprehensive of obtaining and redeveloping the site. Our objective is to obtain and maintain high quality businesses that will revitalize and enhance the County's economic vitality.

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We are specifically interested in using brownfields redevelopment as a springboard for greater involvement by the County in promoting the long-term health and restoration of the Pecatonica River. The Pecatonica River is one of the greatest untapped recreational resources in Stephenson County. Due to the recent increased popularity of the Pecatonica River for recreational purposes, Stephenson County passed a Resolution designating the Pecatonica River as a Water Trail on March 15, 2006. The establishment of the Water Trail will substantially add to the quality of life of the County's residents as well promote recreational and tourism opportunities within the County. As we work to redevelop brownfield sites along and near our riverfront, we will work to fully characterize impacts of brownfields on our rivers and seek remedial approaches that restore and enhance these precious resources.

2. We have developed a strong working relationship with both the Stephenson County Health Department and the Illinois Department of Public Health and will work with them to discover any potential links between this brownfields project and area health issues. Building on this partnership will enable the County to achieve our goals of restoring the environment and protecting the health of our citizens. The assistance and cooperative efforts of the County Health Department, the Illinois Department of Public Health, and the Illinois Environmental Protection Agency has proved invaluable to the County in resolving the immense task ahead of us. The Stephenson County Health Department has been very responsive and supportive in our efforts to gather information in regards to possible contaminants and their health effects, as well as groundwater contamination information. The Illinois Department of Public Health has worked with us to identify known and potential sites of contamination and has provided us with vital health statistics from the area that could assist us in linking this project with area health issues. Throughout our project, we will carefully consider potential health risks to our residents. If specific hazardous substances are identified through our assessment activity, we will share our data with both the Stephenson County Health Department and the Illinois Department of Public Health's respective health officials to discuss human health and environmental concerns. The potential contaminants that we are concerned about or believe to be present based upon historic use are chlorinated solvents, metals, semi-volatile organic compounds, asbestos, lead-based paint, and controlled substances.

The Illinois Environmental Protection Agency will be a vital partner in overseeing the assessment and redevelopment of brownfield sites in our county, particularly the Site Remediation Program Project Managers. The sites that will be determined as contaminated will be enrolled into the Illinois Environmental Protection Agency's Site Remediation Program (SRP), which is the Illinois Environmental Protection Agency's voluntary cleanup program. Remediation and cleanup efforts will continue at the site until the Illinois Environmental Protection Agency issues a "No Further Remediation" letter for the site.

### **I. Leveraging of Additional Resources**

1. Stephenson County is requesting \$200,000 in Hazardous Substance Assessment grant funds. These funds will assist the County in:

- Site Selection & Eligibility Determinations
- Health and Safety Plan/Quality Assurance Project Plan
- Phase I Environmental Site Assessments
- Phase II Environmental Site Assessments/Remedial Planning
- Illinois Environmental Protection Agency Expenses
- Community Outreach
- Program Development

Stephenson County is realistic in realizing that the \$200,000 will not fund all of the goals set for the assessment and redevelopment phase of this overall project. Public and private dollars will be sought to

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offset the shortfall in costs. We will place an emphasis on obtaining local funds to assist with our assessment and redevelopment efforts.

Stephenson County has several communities that contain Tax Increment Financing (TIF) Districts as well as State Enterprise Zones. Funding from these sources will be sought within the respective municipalities to avoid using the very limited general funds available to them. In addition to hard-dollar contributions to the project, we anticipate continuing to contribute in-kind services for this project. Staff time, particularly in the compilation of the County Board Chairman, County Administrator, and Illinois EPA's Office of Brownfields Assistance endeavors, will be significant.

2. Our assessment and redevelopment efforts will continue to avail itself of other sources of State and Federal Grant funds to ensure that cleanup and restoration is achieved at our selected, priority project sites. In particular, we will pursue funding from the following:

▪ **Illinois Environmental Protection Agency (IEPA) Municipal Brownfields Redevelopment Grant Program (MBRG):** This funding will be pursued by specific municipalities in the County to address any funding gaps and to fund the cleanup of priority sites that we have assessed with United States Environmental Protection Agency funding.

▪ **Illinois Department of Natural Resources (IDNR) Open Space Land Acquisition and Development (OSLAD) Grant Program:** This funding will be sought after to acquire and develop open, green, or recreational space within the County.

▪ **Illinois Department of Natural Resources (IDNR) Recreational Trail Program:** This funding would be pursued for the development of recreational trail that would wind throughout the County, particularly along the Pecatonica River, and connect to established trails such as the Jane Addams Trail and the Grand Illinois Trail

▪ **Private Investment:** Our brownfield sites will be prioritized for cleanup based upon its redevelopment potential. This will make it much easier to obtain considerable private investment for the redevelopment of those properties

While we hope to be successful in obtaining a plethora of leveraging resources for this project, as a small municipality, we do not have the capacity, tax base, or funding to meet the challenges that this brownfields assessment project requires without EPA assistance. Without the support of U.S. EPA, these environmental issues would remain, further impacting human health and safety, and the economic viability of the County.

### **J. Programmatic Capability**

1. We have demonstrated success in the management of previously awarded grants since the inception of our Brownfields Program and would continue utilizing this effective system with any future U.S. EPA funding. As mentioned above, for certain project tasks, which are associated with the administration and compliance of the As it relates to remedial activities, we will require qualified consultants and contractors to perform remediation and will work direction with Illinois EPA Site Remediation Program experienced project managers to oversee and approve those activities. Federal procurement requirements will be applied when outsourcing for any consulting assistance associated with this assessment grant.

Demonstrations of the successes we have achieved to date with U.S. EPA funding include the following key accomplishments:

- Identification of 83 contaminated or potentially contaminated properties
- Prioritization of potential brownfields sites by the County's Brownfields Redevelopment Advisory Committee (BRAC)
- Three (3) Phase I Environmental Site Assessments Completed

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- Seven (7) Phase II Environmental Site Assessments Completed
- Enrollment of Three (3) Sites into the Illinois EPA Site Remediation Program (SRP)
- Reuse Study Completed for Tutty Baker Park and Former Mortuary Site
- Development of a Successful Cooperative Effort with the City of Freeport
- Redevelopment of a Former Milk Creamery into a Successful Manufacturing Business (Village of Pearl City)

Several of the Phase II Environmental Site Assessments performed had Phase I Environmental Site Assessments that were financed either privately by the property owners or through other public funds. Stephenson County and the City of Freeport worked collaboratively on assessment activities to position several properties for cleanup and redevelopment.

2. Stephenson County has an exceptional record in the management of federal funds. Since 2005, Stephenson County has been working with U.S. EPA on the implementation of Community-wide Assessment Grants. Stephenson County has never had any adverse audit findings from an OMB Circular A-133 audit, an audit conducted by a federal, state, tribal, or local government inspector general, or audits conducted by the U.S. Government Accountability Office. Stephenson County has never been required to comply with special “high risk” terms and conditions under agency regulations implementing OMB Circular A-102.

3. Stephenson County was awarded two (2) \$200,000 Assessment Grants in 2005. Stephenson County’s Brownfields Program has completed and filed all necessary deliverables in an accurate and timely manner. A narrative of active projects is updated on a quarterly basis with a detailed report of the progress.

4. We understand the importance of identifying the outcomes and outputs that our Brownfield Project will achieve. Agencies that award federal grants funds require the reporting of these outcomes and outputs to help justify the use of their funds and to secure the future of their funding programs. We will demonstrate to U.S. EPA the important outcomes and outputs of our Brownfield Project by regularly updating the Property Profile forms for each site that is targeted for assessment. We will specifically identify the following:

#### *Outcomes of Assessment Grant Funding:*

- Acreage of land in which environmental threats have been characterized
- Acreage of land positioned for reuse
- Jobs leveraged (from catalyzed redevelopment along the Corridor)
- Funding leveraged
- Acreage of greenspace created or preserved

#### *Outputs of Assessment Grant Funding:*

- Phase I Environmental Site Assessments at three (3) to five (5) sites
- Phase II Environmental Site Assessments at three to five (3-5) sites (will vary depending on outcome of Phase I ESA’s). Phase II Environmental Site Assessments will sample for the Illinois EPA Target Compound List (TCL) that includes volatile organic compounds, semi-volatile organic compounds, metals, pesticides, and PCB’s all to position the site for enrollment in the SRP if contamination is discovered. While the TCL laboratory work is expensive, it allows a site to be enrolled into the SRP as a “Comprehensive” site.
- Enrollment of two (2) to three (3) sites into the Illinois Environmental Protection Agency’s SRP as “Comprehensive” sites, providing the greatest degree of protection with the final No Further Remediation (NFR) letter received at the end of the SRP process.